



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

**REPLY COMMENTS OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) ON
ECONOMIC MODELING ISSUES UNDER AB 32**

CHRISTOPHER J. WARNER

Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105
Telephone: (415) 973-6695
Facsimile: (415) 972-5220
E-Mail: CJW5@pge.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: January 18, 2008

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OF THE STATE OF CALIFORNIA**

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I. INTRODUCTION

Pursuant to the ruling of the Administrative Law Judges dated November 9, 2007 (ALJs' Ruling), Pacific Gas and Electric Company (PG&E) provides its reply comments on economic modeling issues under AB 32. PG&E's reply comments are presented as follows: (1) a summary of comments from parties who agree with PG&E's major points and recommendations in its opening comments; (2) responses to comments inconsistent with PG&E's opening comments.

II. MOST PARTIES AGREE WITH PG&E'S MAJOR RECOMMENDATIONS REGARDING IMPROVING THE ECONOMIC MODELING OF AB 32 COSTS AND BENEFITS

PG&E appreciates that most parties appear to provide the same or similar recommendations as PG&E regarding how to improve and enhance the economic modeling of AB 32 cost, benefits, and proposed GHG reduction measures, including an open process for reviewing and evaluating the modeling assumptions and results. For example, parties appear to agree that assumptions by E3 and the Staff Workpaper regarding future Customer Energy Efficiency (CEE) are extremely aggressive and

require initiatives and actions by many entities other than LSEs, including local governments, builders and customers.^{1/} The Center for Energy Efficiency and Renewable Technology (CEERT) correctly states that 100% of economic potential should “not form the basis of energy planning scenarios.”^{2/} The Natural Resources Defense Council (NRDC) notes that the energy efficiency “values adopted by E3 for the baseline scenario are relatively high.”^{3/}

Parties also appear to agree that sensitivity analyses are needed before model results are used. Parties note that model results are approximations and are vastly inexact.^{4/} An example mentioned by several parties is that load growth may be higher than modeled because of electrification that reduces GHG emission from other sectors.^{5/} Parties agree that more instruction and documentation on the E3 “GHG calculator” is needed to understand outputs.^{6/}

Parties also commented that the modeling needs to look for GHG reduction opportunities beyond the electricity sector and provide a metric to compare reduction

1/ See, e.g., CEERT at 16-17, NRDC at 8, SDG&E at 9, WPTF at 2, 4, SCPPA at 11.

2/ CEERT at 16-17.

3/ NRDC at 8.

4/ WPTF at 3; GPI at 6,9; DRA at 1-7; Pacificorp at 23; NRDC at 17; SCE at 9- 10. PG&E notes that SCPPA’s comments assume that the CEE potential for IOUs includes savings amounting to 25% from changes in building codes and appliance standards, whereas the CEE potential for publicly owned utilities does not. (SCPPA, p.8). PG&E believes SCPPA is incorrect and in fact the Itron Report, on which the CEE potential is based, excludes codes and standards from both IOU and publicly owned utility potential. (“California Energy Efficiency Potential Study,” Itron, May 24, 2006, p.3-9, ES-7.)

5/ SCE at 14- 15, Pacificorp at 24, CEERT at 23.

6/ WPTF at 7, SMUD at 6, SCPPA at 15-16, SCE at 5- 7.

opportunities across sectors.^{7/} Similarly, parties commented that, currently, the model results are more useful in showing cost impacts on a statewide basis rather than on an LSE specific basis.^{8/} Parties have highlighted the difficulties of assigning specific generation to load, even for generation that exists today, and the inability of individual retail providers to test unique resource mixes, especially because the majority of retail providers are not represented in the model.^{9/}

PG&E believes these comments represent an important and notable consensus on the next steps that the CPUC, CEC and staff and consultants should take in this modeling effort. Broadly speaking, the credibility of California's efforts to achieve significant GHG reductions and to do so fairly across all sectors depends on the credibility and validity of the economic modeling that is taking place in this proceeding and at the ARB. For these reasons, PG&E recommends that the CPUC and CEC immediately redirect the next phase of the economic modeling consistent with these important comments and recommendations by multiple parties.

III. RESPONSES TO SPECIFIC COMMENTS

A. Adopting a 33% Renewable Portfolio Standard May Not Be a Cost-Effective GHG Reduction Measure and Requires Further Analysis

1. A 33% Numerical Standard for Renewables is Premature

The Green Power Institute (GPI), NRDC, and the Union of Concerned Scientists (UCS) recommend that a 33% RPS target by 2020 should be adopted as a policy

^{7/} SDGE & SoCal Gas at 7, NRDC at 19, Pacificorp at 26.

^{8/} LADWP at 8-9, SCE at 30-31, SDG&E at 6.

^{9/} SCPPA at 14, 16, SMUD at 2, AReM at 2, NCPA at 2, Pacificorp at 15, LADWP at 5-8, WPTF at 8, SDG&E at 8.

measure aimed at reducing GHG emissions.^{10/} To date, however, available economic modeling suggests a 33% RPS target by 2020 may not be cost-effective as compared to reductions available in other sectors. PG&E remains committed to increasing the use of renewables, but as noted in its opening comments, a number of critical issues must be resolved, and additional feasibility assessments performed, prior to reassessing the existing 20% RPS target. These issues and assessments include: (1) adequacy of supply; (2) adequacy and availability of transmission infrastructure, and (3) how to integrate new renewable resources into the grid and manage over-generation.^{11/} Moreover, AB 32 requires that GHG reduction strategies, including the role of new renewables, be evaluated and considered in light of all other potential strategies, so that the adopted GHG limits and emissions reduction measures “achieve the maximum technologically feasible and cost-effective reductions” in GHGs. (Health and Safety Code 38562(a).) Without this analytical and cost-benefit modeling, a 33% RPS target in and of itself is not consistent with AB 32.

Similarly, CEERT proposes that the Renewable Energy Transmission Initiative (RETI) process be designated by the CPUC as the coordinated planning process for meeting RPS targets in the current statute (20% RPS), along with becoming the official renewable planning mechanism for AB 32.^{12/} This additional responsibility is

^{10/} GPI, “Comments of the Green Power Institute on Modeling-Related Issues,” p. 6. NRDC and UCS, “Comments of the Natural Resources Defense Council and the Union of Concerned Scientists on Modeling-Related Issues,” p. 7.

^{11/} Pacific Gas and Electric Company, “Docket 07-OIIP-01, California Energy Commission, Opening Comments of Pacific Gas and Electric Company (U 39 E) on Economic Modeling Issues Under AB 32,” pp. 17-23.

^{12/} Center for Energy Efficiency and Renewable Technologies, “Opening Comments of the Center for Energy Efficiency and Renewable Technologies on E3 Modeling Methodology and Staff Workpaper on Emission Reduction Measures,” p. 28.

inconsistent with RETI's Mission Statement. Consistent with RETI's Mission Statement, PG&E believes that RETI's principal areas of focus should be to assess competitive renewable energy zones (CREZ) and to develop detailed transmission plans of service for each CREZ,^{13/} as opposed to taking on non-transmission related planning or regulatory compliance responsibilities. The output to be provided by RETI should assist the utilities in their renewable procurement planning efforts, and not substitute for those efforts, in accordance with the Commission's intention reflected in Decision 07-12-052.^{14/}

2. Integration and Transmission Issues

On the issues of integration and firming of new renewables, PG&E agrees with other parties that the costs of integration of renewable energy, especially wind, should be examined carefully and may be underestimated for purposes of this AB 32 modeling effort.^{15/} PG&E agrees with many parties' comments on the importance of system reliability and the need for additional analysis, including verifying minimum load conditions and sufficient transmission in the dispatch model.^{16/}

On the other hand, several parties propose to ignore the need for dispatchable and operationally flexible capacity to integrate wind generation. For example, CEERT argues that because wind is primarily an energy resource and because individual loads and generators do not need to be balanced, there is no need for back-up generation for

^{13/} Renewable Energy Transmission Initiative Mission Statement, September 17, 2007, pp. 1-3.

^{14/} D.07-12-052, "Opinion Adopting Pacific Gas and Electric Company's, Southern California Edison's and San Diego Gas & Electric Company's Long-Term Procurement Plans," Findings of Fact, #33, p. 274.

^{15/} WPTF at Pg 4; SCCPA at pg 5.

^{16/} WPTF at Pg 4, 7, 8; SCCPA (9, 12-13).

wind.^{17/} The reality is that wind generation is intermittent and uncertain. The system does need additional generation for regulation, ramping and load following. A study finalized by the CAISO in November 2007 found that in order to integrate 6,700 MW of wind generation (~ 2,600 MW existing and ~ 4,100 MW new), the system ‘would need about 250 MW for “Up Regulation” and up to 500 MW for “Down Regulation.^{18/} The CAISO also found that it needed approximately 800 MW of and ramping capacity to meet multi-hour ramps during the morning load increase coupled with declining wind generation^{19/} plus significant increase of the supplemental energy stack for load following. However, the CAISO study did not quantify the associated costs for these needs nor costs for mitigating these needs with wind forecasting and storage among other mitigation techniques. Hence, currently there is no forecast of integration costs at high penetration levels specific to the California system for E3 to use in its estimates of integration costs as desired by CEERT and NRDC. Still, these costs must be factored into the analysis and modeling.

As explained in PG&E’s 2006 LTPP, PG&E compared the current resource adequacy (RA) value of its existing wind generation against the actual output received from those sources at the time of the CAISO peak demand for each month over the last three years. This analysis shows that on average, the actual output received during the peak hour in summer months from these sources ranges between 0.3% to 7% of wind installed capacity. In contrast, the RA value of existing wind generation calculated

^{17/} CEERT at 36.

^{18/} CAISO Integration of Renewables Study, November 2007, at 7.

^{19/} CAISO Integration of Renewables Study at 11.

using the Commission-adopted counting rules, which ranges between 12% and 37% of installed capacity. Therefore, E3's assumption that wind resources operate at a 10% capacity factor seems too high.^{20/}

CEERT also recommends E3 use an Effective Load Carrying Capability (ELCC) of about 20% for wind.^{21/} PG&E does not object to the use of ELCC values provided they are done correctly, use actual data, and account for wind volatility and the correlation between high temperature, high load, and low wind generation, which is the typical pattern in California. However, it is unclear how ELCC as a measure of impact to system reliability, would be used in Least Cost Best Fit (LCBF) and bid evaluation for intermittent resources like wind because it does not comport with Resource Adequacy accounting or procurement protocols. Capacity credit must be weighted to the value of capacity in the market, which typically changes seasonally. For example, capacity credit for wind production during the on-peak period in May and June are considerably higher than the July-September period when the value of that capacity is typically highest.

Furthermore, the capacity credit, using an ELCC methodology, does not capture the costs associated with back-up reserves that might be required by an electric service provider (ESP) to balance load, generation and reserve requirements. For example, the 24% Northern California wind capacity credit (ELCC) reported in the Multi-Year Analysis^{22/} is much higher than what the CAISO has historically observed for Northern California wind (< 5%) during system peaks. PG&E does not object to the use of ELCC

^{20/} PG&E's Long-Term Procurement Plan filing, Volume 1, at IV-76.

^{21/} CEERT at 36.

^{22/} CEC California Renewable Portfolio Standard Renewables Integration Cost Analysis: Multi-year Analysis and Recommendations page xii.

values provided they can be modified to capture monthly variations (as the current Resource Adequacy methodology does), use actual data, and account for wind volatility and the correlation between high temperature, high load, and low wind generation, which is typical in California.

Therefore, the economic modeling of additional wind energy as a source for GHG reductions should take into account the fact that not only does wind generation provide little or no capacity, but it also requires additional dispatchable and operationally flexible capacity to manage the additional regulation, ramping and load following requirements that wind energy creates at deeper penetration levels. The net result may not be significant or feasible reductions in GHGs.

In a similar vein, the Green Power Institute (GPI) argues that although intermittent renewable resources add a new component to the unpredictability of loads and supplies on the grid, the unpredictability per se is not something that is new to the grid or unmanageable.^{23/} PG&E agrees that unpredictability may not be new, but the magnitude will significantly increase and require additional costs to integrate incremental wind resources. As explained above, the CAISO integration of renewable resources study finds that additional generation capacity is needed for regulation, ramping and load following requirements associated with wind.

B. Evaluating Potential GHG Reductions from CHP

In their comments, CAC-EPUC claim that existing and new “combined heat and power” (“CHP”) resources could save millions of metric tons of GHG emissions,

^{23/} GPI at 3.

referencing an aggressive scenario from a 2005 CEC report to support their claims.^{24/}

What CAC-EPUC does not say is that the majority of existing CHP capacity corresponds to large CHP systems greater than 20 MW, and that the CEC forecast is mostly comprised of such systems. Further, the largest of the active CHP capacity is located in the oil fields to provide steam for enhanced oil recovery (EOR).^{25/} EOR generation is often sold to utilities under standard offer contracts, at above market prices, and subject to PURPA efficiency requirements that are lower than the efficiency of current available CCGT technology. Thus, it is not clear that additional CHP is likely to provide incremental GHG reduction benefits compared to other generation sources.

Nor do CAC-EPUC mention that the savings estimated in the CEC CHP Assessment were based on the assumption of efficient CHP systems against low efficiency 30- to 50-year old steam turbine based electrical generation.^{26/} As PG&E pointed out in its opening comments, contrary to CAC-EPUC and the earlier CEC CHP Assessment, the alternative to CHP baseload generation is not an aging powerplant with a higher than 10,000 Btu/kWh heat rate. Any analysis of CHP fuel or emission savings should reflect realistic electric generation alternatives, which E3's analysis considers. Specifically, emissions from CHP generation should be compared to emissions from the combination of a new gas fired CCGT plus a new gas fired boiler. The result is not likely to find significant GHG reduction benefits.

An analysis of CHP fuel or emission savings should also reflect likely CHP

^{24/} CAC-EPUC, at 3-5.

^{25/} Assessment of California CHP Market and Policy Options for Increased Penetration (CEC CHP Assessment), PIER Collaborative Report, November 2005, CEC-500-2005-173, p. 2-2.

^{26/} CEC CHP Assessment, p 2-20.

potential. The CEC CHP Assessment's Aggressive Market Access projects a total of 5,348 MW of new CHP power—2,479 MW from new onsite CHP and 2,869 MW of new export MW. It is not clear where these numbers of new CHP projects are going to come from. In the PG&E area, there are presently a little more than 900 MW of EOR based CHP electrical generation. To add 2,800 MW of export generation with the same thermal efficiency as EOR does not appear to be realistic.

CAC-EPUC also argue that the actual total cost of the CHP facility is not an appropriate consideration in determining impacts on ratepayer cost because the cost of the electric power to ratepayers is the “avoided cost payments” made to the CHP facility consistent with Commission policy.^{27/} However, CAC-EPUC propose that in order to maximize GHG reductions from CHP, the GHG policy framework should include: (1) portfolio set-aside for CHP power purchases by the utilities, similar to the RPS; (2) “reasonable pricing provisions” for power purchases from CHP facilities; and removal of “deployment barriers”, including eliminating departing load charges.^{28/}

The purpose of the E3 exercise is to determine the least cost approach to achieve a desired reduction in GHG emissions, not to create a new set-aside or non-competitive subsidy for CHP. A significant cost element of CHP cannot be arbitrarily left out in determining CHP's order in the GHG supply curve. Because there are different CHP projects with different costs, fuel efficiencies, and potential savings, it is important that the E3 analysis recognize the potential for different CHP applications and their relative differences in cost, benefits and other attributes.

^{27/} CAC-EPUC, at 8.

^{28/} CAC-EPUC, at 11.

PG&E recommends that CAC-EPUC's recommendations not be adopted, and instead the E3 analysis should reflect the true potential for different CHP applications, and their respective costs, and benefits, including the full cost of the CHP facilities. Subsidies are outside the scope of the economic modeling exercise, and in any event should only be necessary for CHP applications that are efficient and cost-effective from a society's perspective but where those projects are not cost-effective to the CHP owner.

NRDC and CEERT also propose increased use of efficient CHP.^{29/} PG&E supports use of efficient CHP, as long as the CHP projects that are implemented are truly efficient, compared to other alternatives available to reduce GHG emissions, and provided there is a fair distribution of costs and benefits between CHP owners and non-CHP owners.

SDG&E and SoCalGas propose that the Commission allow cogeneration developed pursuant to AB 1613 to come under the energy efficiency umbrella.^{30/} PG&E understands this proposal as the utility being able to count the CHP savings towards its energy efficiency goals. AB1613 was designed to foster CHP installations of less than 20 MW that meet a minimum efficiency standard to be determined by the California Energy Commission by January 1, 2010. Whether small AB1613 CHP savings are counted as efficiency savings is outside the scope of the modeling effort, but also depends first on: a) what is the efficiency benchmark, which has not been determined by the CEC, and b) how the efficiency savings are allocated between the CHP owner and the electric utility customers who are required to buy the CHP's surplus energy. Given

^{29/} NRDC at 5; CEERT at 21.

^{30/} SDG&E and SoCal Gas at 4.

that these key elements of the legislation remain to be defined, it is too early to take a position on whether and how much of the AB1613 savings can be counted towards energy efficiency as part of the design of the AB 32 program. Furthermore, the definition of energy efficiency, which is an issue outside the scope of this proceeding, has an extensive legislative and regulatory history and in fact has not previously been applied to customer generation.

IV. CONCLUSION

For the reasons stated above, PG&E recommends that the E3 Model and Staff Workpaper be revised as recommended in these comments. In addition, PG&E recommends that the CPUC and Energy Commission provide that any decisions or recommendations on the design of an AB 32 regulatory mechanism for the electric and gas sectors take into account the results and conclusions upon completion of the modeling.

Respectfully Submitted,

CHRISTOPHER J. WARNER

By: _____ /s/
CHRISTOPHER J. WARNER

Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105
Telephone: (415) 973-6695
Facsimile: (415) 972-5220
E-Mail: CJW5@pge.com

Dated: January 18, 2007

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of "**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) ON ECONOMIC MODELING ISSUES UNDER AB 32**" on the parties listed in the official service list for R.06-04-009 by

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/s/
MARTIE L. WAY

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abb@eslawfirm.com;abonds@thelen.com;achang@nrdc.org;adamb@greenlining.org;aeg@cpuc.ca.gov;agc@cpuc.ca.gov;agrimaldi@mckennalong.com;aimee.barnes@ecosecurities.com;ajkatz@mwe.com;akbar.jazayeri@sce.com;akelly@climatetrust.org;alan.comnes@nrgenergy.com;aldyn.hoekstra@paceglobal.com;alho@pge.com;amber@ethree.com;andrew.bradford@constellation.com;andrew.mcallister@energycenter.org;andy.vanhorn@vhcenergy.com;anita.hart@swgas.com;annabelle.malins@fco.gov.uk;annette.gilliam@sce.com;apak@sempraglobal.com;arno@recurrentenergy.com;atrial@sempra.com;atrowbridge@daycartermurphy.com;Audra.Hartmann@Dynegy.com;aweller@sel.com;ayk@cpuc.ca.gov;bbaker@summitblue.com;bbc@cpuc.ca.gov;bbeebe@smud.org;bblevins@energy.state.ca.us;bcragg@goodinmacbri.de.com;bdicapo@caiso.com;bernardo@braunlegal.com;beth@beth411.com;Betty.Seto@kema.com;bill.chen@constellation.com;bill.schrand@swgas.com;bjeider@ci.burbank.ca.us;bjl@bry.com;bjones@mjbradley.com;bkc7@pge.com;blm@cpuc.ca.gov;bmcc@mccarthylaw.com;bmcqown@reliant.com;Bob.lucas@calobby.com;bpotts@foley.com;bpurewal@water.ca.gov;brabe@umich.edu;brbarkovich@earthlink.net;BRBc@pge.com;brenda.lemay@horizonwind.com;burraw@rff.org;bushinskyj@pewclimate.org;bwallerstein@aqmd.gov;bwetstone@hotmail.com;C_Marnay@lbl.gov;cadams@covantaenergy.com;californiadockets@pacificorp.com;carla.peterman@gmail.com;carter@ieta.org;case.admin@sce.com;cathy.karlstad@sce.com;cbaskette@enernoc.com;cbreidenich@yahoo.com;cchen@ucsusa.org;cem@newsdata.com;cf1@cpuc.ca.gov;cft@cpuc.ca.gov;charlie.blair@delta-ee.com;chilen@sppc.com;cjw5@pge.com;ckmitchell1@sbcglobal.net;ckrupka@mwe.com;clarence.binner@doj.ca.gov;clark.bernier@rlw.com;clyde.murley@comcast.net;cmkehrein@ems-ca.com;colin.petheram@att.com;cpe@cpuc.ca.gov;cpechman@powereconomics.com;cswoollums@midamerican.com;curt.barry@iwpnews.com;curtis.kebler@google.com;Cynthia.A.Fonner@constellation.com;cyntia.schultz@pacificorp.com;daking@sempra.com;Dan.adler@calcef.org;danskopec@gmail.com;Dansvec@hdo.net;dave@ppallc.com;david.zonana@doj.ca.gov;david@branchcomb.com;david@nemtzow.com;davidreynolds@ncpa.com;dbrooks@nevpl.com;deb@aklaw.com;deborah.slons@doj.ca.gov;dehling@klng.com;derek@climateregistry.org;dhecht@sempratrading.com;dhuard@manatt.com;Diane_Fellman@fpl.com;dietrichlaw2@earthlink.net;dil@cpuc.ca.gov;dkk@eslawfirm.com;dks@cpuc.ca.gov;dmacmull@water.ca.gov;dmetz@energy.state.ca.us;dniehaus@semprauilities.com;douglass@energyattorney.com;dseperas@calpine.com;dsh@cpuc.ca.gov;dsoyars@sppc.com;dtibbs@aes4u.com;dwang@nrdc.org;dwood8@cox.net;dws@r-c-s-inc.com;echiang@elementmarkets.com;edm@cpuc.ca.gov;egw@aklaw.com;ehadley@reupower.com;ej_wright@oxy.com;ek@aklaw.com;ekgrubaugh@iid.com;eks@cpuc.ca.gov;ELL5@pge.com;elvine@lbl.gov;emahlon@ecoact.org;emello@sppc.com;epoole@adplaw.com;e-recipient@caiso.com;etiedemann@kmtg.com;ewolfe@resero.com;ez@pointcarbon.com;farrokh.albuyeh@oati.net;fiji.george@elpaso.com;filings@aklaw.com;fjs@cpuc.ca.gov;fstern@summitblue.com;fwmonier@tid.org;gbarch@knowledgeinenergy.com;gblue@enxco.com;gcollard@arb.ca.gov;george.hopley@barcap.com;ghinners@reliant.com;GloriaB@anzaelectric.org;glw@eslawfirm.com;gmorris@emf.net;gpickering@navigantconsulting.com;gregory.koiser

@constellation.com;grosenblum@caiso.com;gsmith@adamsbroadwell.com;gxl2@pge.com;harveyederps
pc.org@hotmail.com;hayley@turn.org;hcronin@water.ca.gov;hgolub@nixonpeabody.com;hoerner@redef
iningprogress.org;hurlock@water.ca.gov;HYao@SempraUtilities.com;hym@cpuc.ca.gov;info@calseia.or
g;jack.burke@energycenter.org;Jairam.gopal@sce.com;james.keating@bp.com;janill.richards@doj.ca.go
v;jarmstrong@goodinmacbride.com;jason.dubchak@niskags.com;jbf@cpuc.ca.gov;jbw@slwplc.com;jcha
mberlin@strategicenergy.com;jci@cpuc.ca.gov;JDF1@PGE.COM;jdh@eslawfirm.com;jdoll@arb.ca.gov;j
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center.org;JerryL@abag.ca.gov;jesus.arredondo@nrgenergy.com;jf2@cpuc.ca.gov;jgill@caiso.com;jgrec
o@caithnessenergy.com;jhahn@covantaenergy.com;jimross@r-c-s-
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m;johnredding@earthlink.net;jol@cpuc.ca.gov;josephhenri@hotmail.com;joyw@mid.org;jsanders@caiso
.com;jscancarelli@flk.com;jsqueri@gmssr.com;jst@cpuc.ca.gov;jtp@cpuc.ca.gov;julie.martin@bp.com;jw
iedman@goodinmacbride.com;jwmctarnaghan@duanemorris.com;jwmctarnaghan@duanemorris.com;jxa
2@pge.com;karen@klindh.com;karla.dailey@cityofpalooalto.org;Kathryn.Wig@nrgenergy.com;kbowen@w
inston.com;kcolburn@symbioticstrategies.com;kdusel@navigantconsulting.com;kdw@woodruff-expert-
services.com;keith.mccrea@sablaw.com;kellie.smith@sen.ca.gov;kelly.barr@srpnet.com;ken.alex@doj.c
a.gov;ken.alex@doj.ca.gov;kenneth.swain@navigantconsulting.com;kerry.hattevik@mirant.com;kevin.bo
udreaux@calpine.com;kfox@wsgr.com;kgough@calpine.com;kgrenfell@nrdc.org;kgriffin@energy.state.c
a.us;kjinnovation@earthlink.net;kjsimonsen@ems-
ca.com;kkhoja@thelenreid.com;klatt@energyattorney.com;kmills@cfbf.com;kmkiener@fox.net;kowalews
kia@calpine.com;krd@cpuc.ca.gov;kyle.l.davis@pacificorp.com;kyle.silon@ecosecurities.com;kyle_boud
reaux@fpl.com;lars@resource-
solutions.org;Laura.Genao@sce.com;lcottle@winston.com;ldecarlo@energy.state.ca.us;leilani.johnson@
ladwp.com;liddell@energyattorney.com;lisa.c.schwartz@state.or.us;lisa_weinzimer@platts.com;llorenz@
semprautilities.com;llund@commerceenergy.com;lmh@eslawfirm.com;Lorraine.Paskett@ladwp.com;lpar
k@navigantconsulting.com;lrdevanna-
rf@cleanenergysystems.com;lrm@cpuc.ca.gov;lschavrien@semprautilities.com;ltenhope@energy.state.c
a.us;ltt@cpuc.ca.gov;marcel@turn.org;marcie.milner@shell.com;mary.lynch@constellation.com;mclaughl
in@braunlegal.com;mday@goodinmacbride.com;mdjoseph@adamsbroadwell.com;mflorio@turn.org;mga
rcia@arb.ca.gov;mgillette@enernoc.com;mhyams@sfwater.org;Mike@alpinenaturalgas.com;mjd@cpuc.
ca.gov;mmattes@nossaman.com;mmazur@3phasesRenewables.com;monica.schwebs@bingham.com;
mpa@a-
klaw.com;mpryor@energy.state.ca.us;mrw@mrwassoc.com;mscheibl@arb.ca.gov;mwaugh@arb.ca.gov;
nenbar@energy-insights.com;ner@cpuc.ca.gov;nes@a-klaw.com;nlenssen@energy-
insights.com;norman.furuta@navy.mil;notice@psrec.coop;npedersen@hanmor.com;nsuetake@turn.org;
ntronaas@energy.state.ca.us;nwhang@manatt.com;obartho@smud.org;obystrom@cera.com;ofoote@hk
cf-
law.com;pbarthol@energy.state.ca.us;pburmich@arb.ca.gov;pduvair@energy.state.ca.us;pepper@clean
powermarkets.com;phanschen@mofo.com;Philip.H.Carver@state.or.us;philm@scdenergy.com;pjazayeri
@stroock.com;ppettingill@caiso.com;pseby@mckennalong.com;ppsp@cpuc.ca.gov;pssed@adelphia.net;
pstoner@lgc.org;pthompson@summitblue.com;pvallen@thelen.com;pw1@cpuc.ca.gov;pzs@cpuc.ca.go
v;rachel@ceert.org;ralph.dennis@constellation.com;ram@cpuc.ca.gov;randy.howard@ladwp.com;randy.
sable@swgas.com;rapcowart@aol.com;ray.welch@navigantconsulting.com;rhelgeson@scppa.org;RHHJ
@pge.com;rhwiser@lbl.gov;richards@mid.org;rick_noger@praxair.com;rita@ritanortonconsulting.com;rk
een@manatt.com;rkmoores@gswater.com;rmccann@umich.edu;rmiller@energy.state.ca.us;rmm@cpuc.c
a.gov;rmorillo@ci.burbank.ca.us;robert.pettinato@ladwp.com;Robert.Rozanski@ladwp.com;roger.montgo
mery@swgas.com;rogerv@mid.org;ron.deaton@ladwp.com;rprince@semprautilities.com;rreinhard@mof
o.com;rrtaylor@srpnet.com;rsa@a-klaw.com;rschmidt@bartlewells.com;rsmutny-
jones@caiso.com;rwinthrop@pilotpowergroup.com;ryan.flynn@pacificorp.com;S1L7@pge.com;saeed.far
rokhpay@ferc.gov;samuel.r.sadler@state.or.us;sandra.carolina@swgas.com;Sandra.ely@state.nm.us;sa
s@a-
klaw.com;sasteriadis@apx.com;sbeatty@cwclaw.com;sberlin@mccarthylaw.com;sbeserra@sbcglobal.ne
t;scarter@nrdc.org;scohn@smud.org;scott.tomashefsky@ncpa.com;scottanders@sandiego.edu;scr@cpu
c.ca.gov;sdhilton@stoel.com;sellis@fypower.org;sendo@ci.pasadena.ca.us;sephra.ninow@energycenter

.org;sgm@cpuc.ca.gov;slins@ci.gendale.ca.us;sls@a-
klaw.com;smichel@westernresources.org;smindel@knowledgeinenergy.com;smk@cpuc.ca.gov;snewso
m@semprautilities.com;spauker@wsgr.com;sscb@pge.com;ssmyers@att.net;steve.koerner@elpaso.co
m;steve@schiller.com;stevek@kromer.com;steven.huhman@morganstanley.com;steven.schleimer@bar
clayscapital.com;steven@iepa.com;steven@lipmanconsulting.com;steven@moss.net;svn@cpuc.ca.gov;s
vongdeuane@semprasolutions.com;svs6@pge.com;tam@cpuc.ca.gov;tburke@swwater.org;tcarlson@reli
ant.com;tcx@cpuc.ca.gov;tdarton@pilotpowergroup.com;tdillard@sierrapacific.com;THAMILTON5@CHA
RTER.NET;thunt@cecmail.org;tiffany.rau@bp.com;tim.hemig@nrgenergy.com;todil@mckennalong.com;
Tom.Elgie@powerex.com;tomb@crossborderenergy.com;tomk@mid.org;trdill@westernhubs.com;trobert
s@sempra.com;UHelman@caiso.com;vb@pointcarbon.com;vitaly.lee@aes.com;vjw3@pge.com;vprabha
karan@goodinmacbride.com;vwelch@environmentaldefense.org;wbooth@booth-
law.com;westgas@aol.com;william.tomlinson@elpaso.com;wsm@cpuc.ca.gov;wtasat@arb.ca.gov;www
@eslawfirm.com;wynne@braunlegal.com;ygross@sempraglobal.com;zaiontj@bp.com;

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CALIFORNIA ENERGY MARKETS

517-B POTRERO AVE
SAN FRANCISCO CA 94110
Email: cem@newsdata.com
Status: INFORMATION

CALIFORNIA ISO

LEGAL AND REGULATORY DEPARTMENT
151 BLUE RAVINE ROAD
FOLSOM CA 95630
Email: e-recipient@caiso.com
Status: INFORMATION

DAN ADLER DIRECTOR, TECH AND POLICY
DEVELOPMENT

CALIFORNIA CLEAN ENERGY FUND
5 THIRD ST, STE 1125
SAN FRANCISCO CA 94103
Email: Dan.adler@calcef.org
Status: INFORMATION

FARROKH ALBUYEH VICE PRESIDENT
OPEN ACCESS TECHNOLOGY INTERNATIONAL INC
SUITE 910
1875 SOUTH GRANT ST
SAN MATEO CA 94402
Email: farrokh.albuyeh@oati.net
Status: INFORMATION

MAHLON ALDRIDGE
ECOLOGY ACTION
PO BOX 1188
SANTA CRUZ CA 95060
Email: emahlon@ecoact.org
Status: INFORMATION

CATHIE ALLEN CA STATE MGR.
PACIFICORP
825 NE MULTNOMAH ST, STE 2000
PORTLAND OR 97232
Email: californiadockets@pacificorp.com
Status: INFORMATION

SCOTT J. ANDERS RESEARCH/ADMINISTRATIVE
DIRECTOR
UNIVERSITY OF SAN DIEGO SCHOOL OF LAW
5998 ALCALA PARK
SAN DIEGO CA 92110
Email: scottanders@sandiego.edu
Status: INFORMATION

MRW & ASSOCIATES, INC.

1814 FRANKLIN ST, STE 720
OAKLAND CA 94612
Email: mrw@mrwassoc.com
Status: INFORMATION

CINDY ADAMS

COVANTA ENERGY CORPORATION
40 LANE ROAD
FAIRFIELD NJ 7004
FOR: Covanta Energy Corporation
Email: cadams@covantaenergy.com
Status: PARTY

CASE ADMINISTRATION

SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE., RM. 370
ROSEMEAD CA 91770
Email: case.admin@sce.com
Status: INFORMATION

MICHAEL P. ALCANTAR ATTORNEY

ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
FOR: Cogeneration Association of California/Energy
Producers and Users Coalition
Email: mpa@a-klaw.com
Status: PARTY

KEN ALEX

PO BOX 944255
1300 I ST, STE 125
SACRAMENTO CA 94244-2550
FOR: People of the State of California
Email: ken.alex@doj.ca.gov
Status: STATE-SERVICE

PETER V. ALLEN

THELEN REID BROWN RAYSMAN & STEINER
101 SECOND ST, STE 1800
SAN FRANCISCO CA 94105
Email: pvallen@thelen.com
Status: INFORMATION

JASMIN ANSAR

PG&E
MAIL CODE B24A
PO BOX 770000
SAN FRANCISCO CA 94177
Email: jxa2@pge.com
Status: INFORMATION

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JEANNE B. ARMSTRONG ATTORNEY
GOODIN MACBRIDE SQUERI DAY & LAMPREY
505 SANSCOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: Wild Goose Storage LLC
Email: jarmstrong@goodinmacbride.com
Status: PARTY

SAKIS ASTERIADIS
APX INC
1270 FIFTH AVE., STE 15R
NEW YORK NY 10029
Email: sasteriadis@apx.com
Status: INFORMATION

GARY BARCH
FELLON-MCCORD & ASSOCIATES, INC.
SUITE 2000
9960 CORPORATE CAMPUS DRIVE
LOUISVILLE KY 40223
Email: gbarch@knowledgeinenergy.com
Status: INFORMATION

AIMEE BARNES MANAGER REGULATORY AFFAIRS
ECOSECURITIES
HARVARD SQUARE
206 W. BONITA AVE
CLAREMONT CA 91711
Email: aimee.barnes@ecosecurities.com
Status: INFORMATION

CURT BARRY
717 K ST, STE 503
SACRAMENTO CA 95814
Email: curt.barry@iwpnews.com
Status: INFORMATION

PANAMA BARTHOLOMY ADVISOR TO CHAIR
PFANNENSTIEL
CALIFORNIA ENERGY COMMISSION
1516 9TH ST
SACRAMENTO CA 95814
Email: pbarthol@energy.state.ca.us
Status: INFORMATION

R. THOMAS BEACH
CROSSBORDER ENERGY
2560 NINTH ST, STE 213A
BERKELEY CA 94710-2557
FOR: the California Cogeneration Council
Email: tomb@crossborderenergy.com
Status: PARTY

JESUS ARREDONDO
NRG ENERGY INC.
4600 CARLSBAD BLVD.
CARLSBAD CA 99208
Email: jesus.arredondo@nrgenergy.com
Status: INFORMATION

ELIZABETH BAKER
SUMMIT BLUE CONSULTING
1722 14TH ST, STE 230
BOULDER CO 80304
Email: bbaker@summitblue.com
Status: INFORMATION

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO CA 95460
Email: brbarkovich@earthlink.net
Status: INFORMATION

KELLY BARR MANAGER, REGULATORY AFFAIRS &
CONTRACTS
SALT RIVER PROJECT
PO BOX 52025, PAB 221
PHOENIX AZ 85072-2025
FOR: Salt River Project Agricultural Improvement and
Power District
Email: kelly.barr@srpnet.com
Status: PARTY

OBADIAH BARTHOLOMY MECHANICAL ENGINEER
SACRAMENTO MUNICIPAL UTILITY DISTRICT
M.S. B257
6201 S. ST
SACRAMENTO CA 95817
Email: obartho@smud.org
Status: INFORMATION

CARMEN E. BASKETTE SENIOR MGR MARKET
DEVELOPMENT
ENERNOC
594 HOWARD ST., STE 400
SAN FRANCISCO CA 94105
FOR: EnerNoc, Inc.
Email: cbaskette@enernoc.com
Status: INFORMATION

SEAN P. BEATTY ATTORNEY
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA ST., 17TH FLR
SAN FRANCISCO CA 94111
Email: sbeatty@cwclaw.com
Status: PARTY

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BUD BEEBE
SACRAMENTO MUNICIPAL UTIL DIST
MS B257
6201 S ST
SACRAMENTO CA 95817-1899
Email: bbeebe@smud.org
Status: INFORMATION

RYAN BERNARDO
BRAUN & BLAISING, P.C.
915 L ST, STE 1270
SACRAMENTO CA 95814
Email: bernardo@braunlegal.com
Status: INFORMATION

SARAH BESERRA
CALIFORNIA REPORTS
39 CASTLE HILL COURT
VALLEJO CA 94591
FOR: California Reports
Email: sbeserra@sbcglobal.net
Status: INFORMATION

CHARLIE BLAIR
DELTA ENERGY & ENVIRONMENT
15 GREAT STUART ST
EDINBURGH UK EH2 7TP UNITED KINGDOM
Email: charlie.blair@delta-ee.com
Status: INFORMATION

GREG BLUE
ENXCO DEVELOPMENT CORP
5000 EXECUTIVE PARKWAY, STE.140
SAN RAMON CA 94583
Email: gblue@enxco.com
Status: INFORMATION

WILLIAM H. BOOTH ATTORNEY
LAW OFFICES OF WILLIAM H. BOOTH
1500 NEWELL AVE, 5TH FLR
WALNUT CREEK CA 94596
FOR: California Large Energy Consumers Association
Email: wbooth@booth-law.com
Status: PARTY

KYLE D. BOUDREAUX
FPL GROUP
700 UNIVERSE BLVD., JES/JB
JUNO BEACH FL 33408
FOR: FPL Energy Project Management
Email: kyle_boudreaux@fpl.com
Status: PARTY

C. SUSIE BERLIN ATTORNEY
MC CARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, STE 501
SAN JOSE CA 95113
FOR: Northern California Power Agency
Email: sberlin@mccarthylaw.com
Status: PARTY

CLARK BERNIER
RLW ANALYTICS
1055 BROADWAY, STE G
SONOMA CA 95476
Email: clark.bernier@rlw.com
Status: INFORMATION

CLARENCE BINNINGER DEPUTY ATTORNEY GENERAL
DEPARTMENT OF JUSTICE
455 GOLDEN GATE AVE, STE 11000
SAN FRANCISCO CA 94102
Email: clarence.binninger@doj.ca.gov
Status: STATE-SERVICE

B. B. BLEVINS EXECUTIVE DIRECTOR
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS-39
SACRAMENTO CA 95814
FOR: California Energy Commission
Email: bblevins@energy.state.ca.us
Status: STATE-SERVICE

ASHLEE M. BONDS
THELEN REID BROWN RAYSMAN&STEINER LLP
SUITE 1800
101 SECOND ST
SAN FRANCISCO CA 94105
Email: abonds@thelen.com
Status: INFORMATION

KEVIN BOUDREAUX
CALPINE POWER AMERICA-CA, LLC
717 TEXAS AVE, STE 1000
HOUSTON TX 77002
FOR: Calpine Power America
Email: kevin.boudreaux@calpine.com
Status: PARTY

KAREN BOWEN ATTORNEY
WINSTON & STRAWN LLP
101 CALIFORNIA ST
SAN FRANCISCO CA 94111
FOR: Mirant California, LLC Mirant Delta, LLC, and Mirant Potrero, LLC
Email: kbowen@winston.com
Status: PARTY

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ALJ Assigned: Jonathan Lakritz on May 9, 2006

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**BIANCA BOWMAN RATE CASE COORDINATOR
PACIFIC GAS AND ELECTRIC COMPANY**
PO BOX 770000 MCB9A
SAN FRANCISCO CA 94177
FOR: PACIFIC GAS AND ELECTRIC COMPANY
Email: BRBc@pge.com
Status: INFORMATION

**DAVID BRANCHCOMB
BRANCHCOMB ASSOCIATES, LLC**
9360 OAKTREE LANE
ORANGEVILLE CA 95662
Email: david@branchcomb.com
Status: INFORMATION

CLARE BREIDENICH
224 1/2 24TH AVE EAST
SEATTLE WA 98112
Email: cbreidenich@yahoo.com
Status: INFORMATION

**GLORIA BRITTON
ANZA ELECTRIC COOPERATIVE, INC.**
58470 HWY 371
PO BOX 391909
ANZA CA 92539
FOR: Anza Electric Cooperative Inc.
Email: GloriaB@anzaelectric.org
Status: PARTY

**DONALD BROOKHYSER ATTORNEY
ALCANTAR & KAHL**
120 MONTGOMERY ST
SAN FRANCISCO CA 94104
FOR: Energy Producers and Users Coalition
Email: rsa@a-klaw.com
Status: PARTY

**ANDREW BROWN ATTORNEY
ELLISON, SCHNEIDER & HARRIS, LLP**
2015 H ST
SACRAMENTO CA 95811
FOR: Constellation New Energy, Inc., Constellation Energy
Commodities Group, Inc. Constellation Generation
Email: abb@eslawfirm.com
Status: PARTY

**JACK BURKE LEGISLATIVE AFFAIRS MANAGER
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY**
8690 BALBOA AVE., STE 100
SAN DIEGO CA 92123
Email: jack.burke@energycenter.org
Status: INFORMATION

**ANDREW BRADFORD SENIOR MARKET RESEARCH
ASSOCIATE
FELLON-MCCORD & ASSOCIATES**
SUITE 2000
9960 CORPORATE CAMPUS DRIVE
LOUISVILLE KY 40223
Email: andrew.bradford@constellation.com
Status: INFORMATION

**DOWNEY BRAND
DOWNEY BRAND**
555 CAPITOL MALL, 10TH FLR
SACRAMENTO CA 95814-4686
FOR: Sacramento Municipal
Status: PARTY

**ADAM BRIONES
THE GREENLINING INSTITUTE**
1918 UNIVERSITY AVE, 2ND FLR
BERKELEY CA 94704
Email: adamb@greenlining.org
Status: INFORMATION

**DONALD BROOKHYSER
ALCANTAR & KAHL**
1300 SW FIFTH AVE., STE 1750
PORTLAND OR 97210
FOR: Cogeneration Association of California
Email: deb@a-klaw.com
Status: PARTY

**DOUGLAS BROOKS NEVADA POWER COMPANY
SIERRA PACIFIC POWER COMPANY**
6226 WEST SAHARA AVE
LAS VEGAS NV 89151
Email: dbrooks@nepv.com
Status: INFORMATION

**VERONIQUE BUGNION
POINT CARBON**
205 SEVERN RIVER RD
SEVERNA PARK MD 21146
Email: vb@pointcarbon.com
Status: INFORMATION

**THERESA BURKE REGULATORY ANALYSTI
SAN FRANCISCO PUC**
1155 MARKET ST, 4TH FLR
SAN FRANCISO CA 94103
Email: tburke@sfgwater.org
Status: INFORMATION

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PAM BURMICH
AIR RESOURCES BOARD
1001 I ST, BOX 2815
SACRAMENTO CA 95812
Email: pburmich@arb.ca.gov
Status: STATE-SERVICE

JOSHUA BUSHINSKY WESTERN POLICY COORDINATOR
PEW CENTER ON GLOBAL CLIMATE CHANGE
2101 WILSON BLVD., STE 550
ARLINGTON VA 95816
Email: bushinskyj@pewclimate.org
Status: INFORMATION

Eugene Cadenasso
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: cpe@cpuc.ca.gov
Status: STATE-SERVICE

TRENT A. CARLSON
RELIANT ENERGY
1000 MAIN ST
HOUSTON TX 77001
Email: tcarlson@reliant.com
Status: INFORMATION

IAN CARTER POLICY COORDINATOR-NORTH AMERICA
INTERNATIONAL EMISSIONS TRADING ASSN.
350 SPARKS ST, STE. 809
OTTAWA ON K1R 7S8 CANADA
FOR: International Emissions Trading Association
Email: carter@ietat.org
Status: PARTY

PHIL CARVER
OREGON DEPARTMENT OF ENERGY
625 MARION ST., NE
SALEM OR 97301-3737
Email: Philip.H.Carver@state.or.us
Status: INFORMATION

AUDREY CHANG STAFF SCIENTIST
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER ST, 20TH FLR
SAN FRANCISCO CA 94104
Email: achang@nrdc.org
Status: PARTY

DALLAS BURTRAW
1616 P ST, NW
WASHINGTON DC 20036
Email: burraw@rff.org
Status: INFORMATION

OLOF BYSTROM DIRECTOR, WESTERN ENERGY
CAMBRIDGE ENERGY RESEARCH ASSOCIATES
555 CALIFORNIA ST, 3RD FLR
SAN FRANCISCO CA 94104
Email: obystrom@cera.com
Status: INFORMATION

Andrew Campbell
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5203
SAN FRANCISCO CA 94102-3214
Email: agc@cpuc.ca.gov
Status: STATE-SERVICE

SANDRA CAROLINA
SOUTHWEST GAS CORPORATION
PO BOX 98510
LAS VEGAS NV 89193-8510
Email: sandra.carolina@swgas.com
Status: INFORMATION

SHERYL CARTER
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER ST, 20TH FLR
SAN FRANCISCO CA 94104
Email: scarter@nrdc.org
Status: INFORMATION

JENNIFER CHAMBERLIN
STRATEGIC ENERGY, LLC
2633 WELLINGTON CT.
CLYDE CA 94520
FOR: Strategic Energy, LLC
Email: jchamberlin@strategicenergy.com
Status: PARTY

Bishu Chatterjee
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
505 VAN NESS AVE AREA 3-E
SAN FRANCISCO CA 94102-3214
Email: bbc@cpuc.ca.gov
Status: STATE-SERVICE

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ALJ Assigned: Jonathan Lakritz on May 9, 2006

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CLIFF CHEN
UNION OF CONCERNED SCIENTIST
2397 SHATTUCK AVE, STE 203
BERKELEY CA 94704
FOR: Union of Concerned Scientists
Email: cchen@ucsusa.org
Status: PARTY

BRIAN K. CHERRY VICE PRESIDENT, REGULATORY
RELATIONS
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE: B10C
SAN FRANCISCO CA 94177
FOR: Pacific Gas and Electric Company
Email: bkc7@pge.com
Status: PARTY

Theresa Cho
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5207
SAN FRANCISCO CA 94102-3214
Email: tcx@cpuc.ca.gov
Status: STATE-SERVICE

KENNETH A. COLBURN
SYMBIOTIC STRATEGIES, LLC
26 WINTON ROAD
MEREDITH NH 3253
Email: kcolburn@symbioticstrategies.com
Status: INFORMATION

ALAN COMMES
WEST COAST POWER
3934 SE ASH ST
PORTLAND OR 97214
Email: alan.commes@nrgenergy.com
Status: INFORMATION

RICHARD COWART
REGULATORY ASSISTANCE PROJECT
50 STATE ST, STE 3
MONTPELIER VT 5602
Email: rapcowart@aol.com
Status: INFORMATION

HOLLY B. CRONIN STATE WATER PROJECT
OPERATIONS DIV
CALIFORNIA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE., LL-90
SACRAMENTO CA 95821
Email: hcronin@water.ca.gov
Status: STATE-SERVICE

WILLIAM H. CHEN DIRECTOR, ENERGY POLICY WEST
REGION
CONSTELLATION NEW ENERGY, INC.
SPEAR TOWER, 36TH FLOOR
ONE MARKET ST
SAN FRANCISCO CA 94105
Email: bill.chen@constellation.com
Status: PARTY

ED CHIANG
ELEMENT MARKETS, LLC
ONE SUGAR CREEK CENTER BLVD., STE 250
SUGAR LAND TX 77478
Email: echiang@elementmarkets.com
Status: INFORMATION

STEVEN M. COHN ASSISTANT GENERAL COUNSEL
SACRAMENTO MUNICIPAL UTILITY DISTRICT
PO BOX 15830
SACRAMENTO CA 95852-1830
FOR: Sacramento Municipal Utility District
Email: scohn@smud.org
Status: PARTY

GARY COLLORD STATIONARY SOURCE DIVISION
AIR RESOURCES BOARD
1001 I ST, PO BOX 2815
SACRAMENTO CA 95812
Email: gcollord@arb.ca.gov
Status: STATE-SERVICE

LISA A. COTTLE ATTORNEY
WINSTON & STRAWN LLP
101 CALIFORNIA ST, 39TH FLR
SAN FRANCISCO CA 94111
FOR: Mirant California, LLC,Mirant Delta, LLC, and Mirant
Potrero, LLC
Email: lcottle@winston.com
Status: PARTY

BRIAN T. CRAGG ATTORNEY
GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY
505 SANSCOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: Independent Energy Producers Association
Email: bcragg@goodinmacbride.com
Status: PARTY

SEBASTIEN CSAPO PROJECT MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE B9A
PO BOX 770000
SAN FRANCISCO CA 94177
Email: sscb@pge.com
Status: INFORMATION

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RAYMOND J. CZAHAR, C.P.A. CHIEF FINANCIAL
OFFICER

WEST COAST GAS COMPANY

9203 BEATTY DRIVE

SACRAMENTO CA 95826

Email: westgas@aol.com

Status: PARTY

THOMAS DARTON

PILOT POWER GROUP, INC.

SUITE 520

8910 UNIVERSITY CENTER LANE

SAN DIEGO CA 92122

FOR: Pilot Power Group

Email: tdarton@pilotpowergroup.com

Status: PARTY

MICHAEL B. DAY ATTORNEY

GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP

505 SANSCOME ST, STE 900

SAN FRANCISCO CA 94111

FOR: Solar Alliance

Email: mday@goodinmacbride.com

Status: PARTY

RONALD F. DEATON

LOS ANGELES DEPARTMENT OF WATER & POWER

111 NORTH HOPE ST, RM 1550

LOS ANGELES CA 90012

FOR: Los Angeles Department of Water and Power

Email: ron.deaton@ladwp.com

Status: PARTY

PAUL DELANEY

AMERICAN UTILITY NETWORK (A.U.N.)

10705 DEER CANYON DRIVE

ALTA LOMA CA 91737

FOR: American Utility Network

Email: pssed@adelphia.net

Status: PARTY

LEONARD DEVANNA EXECUTIVE VICE PRESIDENT

CLEAN ENERGY SYSTEMS, INC.

11330 SUNCO DRIVE, STE A

RANCHO CORDOVA CA 95742

FOR: Clean Energy Systems, Inc.

Email: Irdevanna-rf@cleanenergysystems.com

Status: PARTY

WILLIAM F. DIETRICH ATTORNEY

DIETRICH LAW

2977 YGNACIO VALLEY ROAD, 613

WALNUT CREEK CA 94598-3535

Email: dietrichlaw2@earthlink.net

Status: INFORMATION

KARLA DAILEY

CITY OF PALO ALTO

UTILITIES DEPARTMENT

BOX 10250

PALO ALTO CA 94303

Email: karla.dailey@cityofpaloalto.org

Status: INFORMATION

KYLE L. DAVIS

PACIFICORP

825 NE MULTNOMAH ST., STE 2000

PORTLAND OR 97232

FOR: PacifiCorp

Email: kyle.l.davis@pacificorp.com

Status: PARTY

Matthew Deal

CALIF PUBLIC UTILITIES COMMISSION

EXECUTIVE DIVISION

505 VAN NESS AVE RM 5215

SAN FRANCISCO CA 94102-3214

Email: mjd@cpuc.ca.gov

Status: STATE-SERVICE

LISA DECARLO STAFF COUNSEL

CALIFORNIA ENERGY COMMISSION

1516 9TH ST MS-14

SACRAMENTO CA 95814

Email: ldecarlo@energy.state.ca.us

Status: STATE-SERVICE

RALPH E. DENNIS DIRECTOR, REGULATORY AFFAIRS

FELLON-MCCORD & ASSOCIATES

CONSTELLATION NEWENERGY-GAS DIVISION

9960 CORPORATE CAMPUS DRIVE, STE 2000

LOUISVILLE KY 40223

Email: ralph.dennis@constellation.com

Status: INFORMATION

BALDASSARO DI CAPO

151 BLUE RAVINE ROAD

FOLSOM CA 95630

FOR: California Independent System Operator

Email: bdicapo@caiso.com

Status: PARTY

THOMAS DILL PRESIDENT

LODI GAS STORAGE, L.L.C.

1021 MAIN ST STE 1500

HOUSTON TX 77002-6509

Email: trdill@westernhubs.com

Status: PARTY

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TREVOR DILLARD
SIERRA PACIFIC POWER COMPANY
PO BOX 10100
6100 NEIL ROAD, MS S4A50
RENO NV 89520
Email: tdillard@sierrapacific.com
Status: INFORMATION

DANIEL W. DOUGLASS ATTORNEY
DOUGLASS & LIDDELL
21700 OXNARD ST, STE 1030
WOODLAND HILLS CA 91367
FOR: Western Power Trading Forum
Email: douglass@energyattorney.com
Status: PARTY

KIRBY DUSEL
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670
Email: kdusel@navigantconsulting.com
Status: INFORMATION

HARVEY EDER
PUBLIC SOLAR POWER COALITION
1218 12TH ST., 25
SANTA MONICA CA 90401
Email: harveyederpspc.org@hotmail.com
Status: INFORMATION

THOMAS ELGIE
POWEREX CORPORATION
1400, 666 BURRARD ST
VANCOUVER BC V6C 2X8 CANADA
Email: Tom.Elgie@powerex.com
Status: INFORMATION

SANDRA ELY
NEW MEXICO ENVIRONMENT DEPARTMENT
1190 ST FRANCIS DRIVE
SANTA FE NM 87501
Email: Sandra.ely@state.nm.us
Status: INFORMATION

STEVE ENDO
PASADENA DEPARTMENT OF WATER & POWER
45 EAST GLENARM ST
PASADENA CA 91105
Email: sendo@ci.pasadena.ca.us
Status: INFORMATION

JEFFREY DOLL
CALIFORNIA AIR RESOURCES BOARD
PO BOX 2815 1001 I ST
SACRAMENTO CA 95812
Email: jdoll@arb.ca.gov
Status: STATE-SERVICE

JASON DUBCHAK ASSOCIATE GENERAL COUNSEL
WILD GOOSE STORAGE LLC
C/O NISKA GAS STORAGE, SUITE 400
607 8TH AVE S.W.
CALGARY AB T2P 0A7 CANADA
FOR: Wild Goose Storage LLC
Email: jason.dubchak@niskags.com
Status: PARTY

PIERRE H. DUVAIR
CALIFORNIA ENERGY COMMISSION
1516 NINTH ST, MS-41
SACRAMENTO CA 95814
Email: pduvair@energy.state.ca.us
Status: STATE-SERVICE

DENNIS M.P. EHLING ATTORNEY
KIRKPATRICK & LOCKHART NICHOLSON GRAHAM
10100 SANTA MONICA BLVD., 7TH FLR
LOS ANGELES CA 90067
FOR: City of Vernon
Email: dehling@klng.com
Status: PARTY

SHAWN ELLIS
2183 UNION ST
SAN FRANCISCO CA 94123
Email: sellis@fypower.org
Status: INFORMATION

NADAV ENBAR
ENERGY INSIGHTS
1750 14TH ST, STE 200
BOULDER CO 80302
Email: [nenbar@energy-insights.com](mailto:nabar@energy-insights.com)
Status: INFORMATION

SAEED FARROKHPAY
FEDERAL ENERGY REGULATORY COMMISSION
110 BLUE RAVINE RD., STE 107
FOLSOM CA 95630
Email: saeed.farrokhpay@ferc.gov
Status: INFORMATION

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DIANE I. FELLMAN DIRECTOR, REGULATORY AFFAIRS
FPL ENERGY PROJECT MANAGEMENT, INC.
234 VAN NESS AVE
SAN FRANCISCO CA 94102
FOR: FPL Energy Project Management Inc
Email: Diane_Fellman@fpl.com
Status: INFORMATION

MICHEL FLORIO ATTORNEYS AT LAW
711 VAN NESS AVE., STE. 350
SAN FRANCISCO CA 94102
Email: mflorio@turn.org
Status: INFORMATION

Cathleen A. Fogel
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: cf1@cpuc.ca.gov
Status: STATE-SERVICE

ORLANDO B. FOOTE, III ATTORNEY
HORTON, KNOX, CARTER & FOOTE
895 BROADWAY, STE 101
EL CENTRO CA 92243
Email: ofoote@hkcf-law.com
Status: INFORMATION

JONATHAN FORRESTER
PG&E
MAIL CODE N13C
PO BOX 770000
SAN FRANCISCO CA 94177
Email: JDF1@PGE.COM
Status: INFORMATION

NORMAN J. FURUTA ATTORNEY
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., STE 1744
SAN FRANCISCO CA 94103-1399
Email: norman.furuta@navy.mil
Status: INFORMATION

LAURA I. GENAO ATTORNEY
SOUTHERN CALIFORNIA EDISON
PO BOX 800
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
Email: Laura.Genao@sce.com
Status: PARTY

Julie A. Fitch
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
505 VAN NESS AVE RM 5119
SAN FRANCISCO CA 94102-3214
Email: jf2@cpuc.ca.gov
Status: STATE-SERVICE

RYAN FLYNN
PACIFICORP
825 NE MULTNOMAH ST, 18TH FLR
PORTLAND OR 97232
Email: ryan.flynn@pacificorp.com
Status: PARTY

CYNTHIA A. FONNER SENIOR COUNSEL
CONSTELLATION ENERGY GROUP INC
550 W. WASHINGTON ST, STE 300
CHICAGO IL 60661
FOR: Constellation Energy Group Inc
Email: Cynthia.A.Fonner@constellation.com
Status: PARTY

Jamie Fordyce
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
505 VAN NESS AVE AREA 5-B
SAN FRANCISCO CA 94102-3214
Email: jbf@cpuc.ca.gov
Status: STATE-SERVICE

KEVIN FOX
WILSON SONSINI GOODRICH & ROSATI
ONE MARKET ST, SPEAR TOWER, 3300
SAN FRANCISCO CA 94105
Email: kfox@wsgr.com
Status: INFORMATION

MICHELLE GARCIA
AIR RESOURCES BOARD
1001 10TH ST
SACRAMENTO CA 95814
Email: mgarcia@arb.ca.gov
Status: STATE-SERVICE

FIJI GEORGE
EL PASO CORPORATION
EL PASO BUILDING
PO BOX 2511
HOUSTON TX 77252
Email: fiji.george@elpaso.com
Status: INFORMATION

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JULIE GILL EXTERNAL AFFAIRS MANAGER
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM CA 95630
FOR: CAISO
Email: jgill@caiso.com
Status: STATE-SERVICE

MELANIE GILLETTE
ENERNOC, INC.
115 HAZELMERE DRIVE
FOLSOM CA 95630
Email: mgillette@enernoc.com
Status: INFORMATION

HOWARD V. GOLUB
NIXON PEABODY LLP
2 EMBARCADERO CENTER, STE. 2700
SAN FRANCISCO CA 94111
Email: hgolub@nixonpeabody.com
Status: INFORMATION

JAIRAM GOPAL
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE, GO1-C
ROSEMEAD CA 91770
Email: Jairam.gopal@sce.com
Status: INFORMATION

JEFFREY P. GRAY
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY ST, STE 800
SAN FRANCISCO CA 94111-6533
FOR: Calpine Corporation
Email: jeffgray@dwt.com
Status: PARTY

Jacqueline Greig
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRANCH
505 VAN NESS AVE RM 4102
SAN FRANCISCO CA 94102-3214
Email: jnm@cpuc.ca.gov
Status: STATE-SERVICE

KAREN GRIFFIN EXECUTIVE OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS 39
SACRAMENTO CA 95814
Email: kgriffin@energy.state.ca.us
Status: STATE-SERVICE

Anne Gillette
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: aeg@cpuc.ca.gov
Status: STATE-SERVICE

ANNETTE GILLIAM ATTORNEY
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE
ROSEMEAD CA 91770
FOR: Southern California Edison
Email: annette.gilliam@sce.com
Status: PARTY

HAYLEY GOODSON ATTORNEY
THE UTILITY REFORM NETWORK
711 VAN NESS AVE, STE 350
SAN FRANCISCO CA 94102
Email: hayley@turn.org
Status: INFORMATION

KASSANDRA GOUGH
CALPINE CORPORATION
1127 11TH ST, STE 242
SACRAMENTO CA 95814
FOR: Calpine Corporation
Email: kgough@calpine.com
Status: INFORMATION

JOSEPH GRECO VICE PRESIDENT - WESTERN REGION
CAITHNESS ENERGY, LLC.
9590 PROTOTYPE COURT, STE 200
RENO NV 89521
Email: jgreco@caithnessenergy.com
Status: INFORMATION

KRISTIN GRENFELL PROJECT ATTORNEY, CALIF.
ENERGY PROGRAM
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER ST, 20TH FLR
SAN FRANCISCO CA 94104
Email: kgrenfell@nrdc.org
Status: PARTY

ANN G. GRIMALDI
MCKENNA LONG & ALDRIDGE LLP
101 CALIFORNIA ST, 41ST FLR
SAN FRANCISCO CA 94111
FOR: Center for Energy and Economic Development
Email: agrimaldi@mckennalong.com
Status: PARTY

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YVONNE GROSS REGULATORY POLICY MANAGER
SEMPRA ENERGY
HQ08C
101 ASH ST
SAN DIEGO CA 92103
Email: ygross@sempraglobal.com
Status: INFORMATION

ELIZABETH W. HADLEY
CITY OF REDDING
777 CYPRESS AVE
REDDING CA 96001
Email: ehadley@reupower.com
Status: INFORMATION

TOM HAMILTON MANAGING PARTNER
ENERGY CONCIERGE SERVICES
321 MESA LILA RD
GLENDALE CA 91208
Email: THAMILTON5@CHARTER.NET
Status: INFORMATION

ANDREW L. HARRIS
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO CA 94177
Email: alho@pge.com
Status: PARTY

JEFFERY D. HARRIS ATTORNEY
ELLISON, SCHNEIDER & HARRIS LLP
2015 H ST
SACRAMENTO CA 95814
FOR: Dynegy
Email: jdh@eslawfirm.com
Status: PARTY

AUDRA HARTMANN
DYNEGY INC.
980 NINTH ST, STE 2130
SACRAMENTO CA 95814
Email: Audra.Hartmann@Dynegy.com
Status: INFORMATION

LYNN HAUG
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H ST
SACRAMENTO CA 95814-3109
Email: lmh@eslawfirm.com
Status: INFORMATION

ELSTON K. GRUBAUGH
IMPERIAL IRRIGATION DISTRICT
333 EAST BARIONI BLVD.
IMPERIAL CA 92251
Email: ekgrubaugh@iid.com
Status: INFORMATION

JEFFREY L. HAHN
COVANTA ENERGY CORPORATION
876 MT. VIEW DRIVE
LAFAYETTE CA 94549
Email: jhahn@covantaenergy.com
Status: INFORMATION

PETER W. HANSCHEN ATTORNEY
MORRISON & FOERSTER, LLP
101 YGNACIO VALLEY ROAD, STE 450
WALNUT CREEK CA 94596
Email: phanschen@mofo.com
Status: INFORMATION

ARNO HARRIS
RECURRENT ENERGY, INC.
1700 MONTGOMERY ST., STE 251
SAN FRANCISCO CA 94111
Email: arno@recurrentenergy.com
Status: INFORMATION

ANITA HART SENIOR SPECIALIST/STATE
REGULATORYAFFAIR
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS NV 89193
Email: anita.hart@swgas.com
Status: INFORMATION

KERRY HATTEVIK
MIRANT CORPORATION
696 WEST 10TH ST
PITTSBURG CA 94565
FOR: Mirant Corporation
Email: kerry.hattevik@mirant.com
Status: PARTY

MARCEL HAWIGER
THE UTILITY REFORM NETWORK
711 VAN NESS AVE, STE 350
SAN FRANCISCO CA 94102
Email: marcel@turn.org
Status: PARTY

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DAN HECHT
SEMPRA ENERGY
101 ASH ST
SAN DIEGO CA 92101
Email: dhecht@sempratrading.com
Status: PARTY

UDI HELMAN
CALIFORNIA INDEPENDENT SYS. OPER. CORP
151 BLUE RAVINE ROAD
FOLSOM CA 95630
FOR: California Independent System Operator Corporation
Email: UHelman@caiso.com
Status: PARTY

JOSEPH HENRI
31 MIRAMONTE ROAD
WALNUT CREEK CA 94597
Email: josephhenri@hotmail.com
Status: INFORMATION

SETH HILTON ATTORNEY
STOEL RIVES
111 SUTTER ST., STE 700
SAN FRANCISCO CA 94104
FOR: El Paso Natural Gas
Email: sdhilton@stoel.com
Status: INFORMATION

ALDYN HOEKSTRA
PACE GLOBAL ENERGY SERVICES
420 WEST BROADWAY, 4TH FLR
SAN DIEGO CA 92101
Email: aldyn.hoekstra@paceglobal.com
Status: INFORMATION

LAURIE TEN HOPE ADVISOR TO COMMISSIONER
BYRON
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS-32
SACRAMENTO CA 95814-5512
Email: ltenhope@energy.state.ca.us
Status: INFORMATION

RANDY S. HOWARD
LOS ANGELES DEPT. OF WATER AND POWER
111 NORTH HOPE ST, RM 921
LOS ANGELES CA 90012
Email: randy.howard@ladwp.com
Status: INFORMATION

RICHARD HELGESON
SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY
225 S. LAKE AVE., STE 1250
PASADENA CA 91101
FOR: Southern California Public Power Authority
Email: rhelgeson@scppa.org
Status: PARTY

TIM HEMIG
NRG ENERGY, INC.
1819 ASTON AVE, STE 105
CARLSBAD CA 92008
Email: tim.hemig@nrgenergy.com
Status: INFORMATION

CHRISTOPHER A. HILEN ASSISTANT GENERAL
COUNSEL
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO NV 89511
Email: chilen@sppc.com
Status: INFORMATION

GARY HINNERS
RELIANT ENERGY, INC.
PO BOX 148
HOUSTON TX 77001-0148
Email: ghinners@reliant.com
Status: INFORMATION

J. ANDREW HOERNER
REDEFINING PROGRESS
1904 FRANKLIN ST
OAKLAND CA 94612
Email: hoerner@redefiningprogress.org
Status: PARTY

GEORGE HOPELY
BARCLAYS CAPITAL
200 PARK AVE
NEW YORK NY 10166
Email: george.hopely@barcap.com
Status: INFORMATION

DAVID L. HUARD ATTORNEY
MANATT, PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD
LOS ANGELES CA 90064
FOR: Los Angeles County/Trans Canada Pipelines
Email: dhuard@manatt.com
Status: PARTY

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JOHN P. HUGHES MANAGER, REGULATORY AFFAIRS
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVE, STE. 2040
SAN FRANCISCO CA 94102
Email: john.hughes@sce.com
Status: PARTY

RAYMOND HUNG
PG&E
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO CA 94177
Email: RHHJ@pge.com
Status: INFORMATION

CAROL J. HURLOCK
CALIFORNIA DEPT. OF WATER RESOURCES
JOINT OPERATIONS CENTER
3310 EL CAMINO AVE. RM 300
SACRAMENTO CA 95821
Email: hurlock@water.ca.gov
Status: STATE-SERVICE

Judith Ikle
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE RM 4012
SAN FRANCISCO CA 94102-3214
FOR: Energy Resources Branch
Email: jci@cpuc.ca.gov
Status: STATE-SERVICE

PETER JAZAYERI
STROOCK & STROOCK & LAVAN LLP
2029 CENTURY PARK EAST, STE 1800
LOS ANGELES CA 90067
Email: pjazayeri@stroock.com
Status: INFORMATION

JOHN JENSEN PRESIDENT
MOUNTAIN UTILITIES
PO BOX 205
KIRKWOOD CA 95646
FOR: Mountain Utilities
Email: jjensen@kirkwood.com
Status: PARTY

LEILANI JOHNSON KOWAL
LOS ANGELES DEPT. OF WATER AND POWER
111 N. HOPE ST, RM 1050
LOS ANGELES CA 90012
Email: leilani.johnson@ladwp.com
Status: INFORMATION

STEVEN HUHMAN
MORGAN STANLEY CAPITAL GROUP INC.
2000 WESTCHESTER AVE
PURCHASE NY 10577
Email: steven.huhman@morganstanley.com
Status: PARTY

TAMLYN M. HUNT ENERGY PROGRAM DIRECTOR
COMMUNITY ENVIRONMENTAL COUNCIL
26 W. ANAPAMU ST., 2ND FLR
SANTA BARBARA CA 93101
FOR: Community Environmental Council
Email: thunt@cecmail.org
Status: PARTY

MICHAEL A. HYAMS POWER ENTERPRISE-
REGULATORY AFFAIRS
SAN FRANCISCO PUBLIC UTILITIES COMM
1155 MARKET ST., 4TH FLR
SAN FRANCISCO CA 94103
Email: mhyams@sfwater.org
Status: INFORMATION

AKBAR JAZAYEIRI DIRECTOR OF REVENUE &
TARIFFS
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. RM 390
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: akbar.jazayeri@sce.com
Status: PARTY

BRUNO JEIDER
BURBANK WATER & POWER
164 WEST MAGNOLIA BLVD.
BURBANK CA 91502
Email: bjeider@ci.burbank.ca.us
Status: INFORMATION

KENNETH C. JOHNSON
KENNETH CARLISLE JOHNSON
2502 ROBERTSON RD
SANTA CLARA CA 95051
FOR: Kenneth Carlisle Johnson
Email: kjinnovation@earthlink.net
Status: PARTY

BRIAN M. JONES
M. J. BRADLEY & ASSOCIATES, INC.
47 JUNCTION SQUARE DRIVE
CONCORD MA 1742
Email: bjones@mjbradley.com
Status: INFORMATION

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ALJ Assigned: Jonathan Lakritz on May 9, 2006

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MARC D. JOSEPH
ADAMS BRADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD. STE 1000
SOUTH SAN FRANCISCO CA 94080
FOR: California Unions for Reliable Energy&Coalition of
California Utility Employees
Email: mdjoseph@adamsbroadwell.com
Status: INFORMATION

Sara M. Kamins
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: smk@cpuc.ca.gov
Status: STATE-SERVICE

JOSEPH M. KARP ATTORNEY
WINSTON & STRAWN LLP
101 CALIFORNIA ST
SAN FRANCISCO CA 94111-5802
FOR: California Cogeneration Council
Email: jkarp@winston.com
Status: PARTY

ADAM J. KATZ
MCDERMOTT WILL & EMERY LLP
600 13TH ST, NW.
WASHINGTON DC 20005
FOR: Morgan Stanley Capital Group, Inc.
Email: ajkatz@mwe.com
Status: PARTY

CURTIS L. KEBLER
J. ARON & COMPANY
SUITE 2600
2121 AVE OF THE STARS
LOS ANGELES CA 90067
FOR: J. Aron
Email: curtis.kebler@gm.com
Status: PARTY

CAROLYN M. KEHREIN
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON CA 95620-4208
Email: cmkehrein@ems-ca.com
Status: INFORMATION

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS
1215 K ST, STE 900
SACRAMENTO CA 95814
Email: steven@iepa.com
Status: INFORMATION

EVELYN KAHL ATTORNEY
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
FOR: Energy Producers & Users Coalition
Email: ek@aklaw.com
Status: PARTY

CATHY A. KARLSTAD
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE.
ROSEMEAD CA 91770
FOR: Southern California Edison Company
Email: cathy.karlstad@sce.com
Status: PARTY

SUE KATELEY EXECUTIVE DIRECTOR
CALIFORNIA SOLAR ENERGY INDUSTRIES ASSN
PO BOX 782
RIO VISTA CA 94571
Email: info@calseia.org
Status: INFORMATION

JAMES W. KEATING
BP AMERICA, INC.
MAIL CODE 603-1E
150 W. WARRENVILLE RD.
NAPERVILLE IL 60563
Email: james.keating@bp.com
Status: INFORMATION

RANDALL W. KEEN ATTORNEY
MANATT PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD.
LOS ANGELES CA 90064
FOR: Los Angeles County
Email: rkeen@manatt.com
Status: INFORMATION

ALEXIA C. KELLY
THE CLIMATE TRUST
65 SW YAMHILL ST, STE 400
PORTLAND OR 97204
Email: akelly@climatetrust.org
Status: INFORMATION

DOUGLAS K. KERNER ATTORNEY
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H ST
SACRAMENTO CA 95814
Email: dkk@eslawfirm.com
Status: INFORMATION

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**KHURSHID KHOJA ASSOCIATE
THELEN REID BROWN RAYSMAN & STEINER**
101 SECOND ST, STE 1800
SAN FRANCISCO CA 94105
Email: kkhoja@thelenreid.com
Status: INFORMATION

**THOMAS S. KIMBALL
MODESTO IRRIGATION DISTRICT**
1231 11TH ST
MODESTO CA 95354
Email: tomk@mid.org
Status: INFORMATION

**GREGORY KLATT ATTORNEY
DOUGLASS & LIDDELL**
411 E. HUNTINGTON DRIVE, STE. 107-356
ARCADIA CA 91006
FOR: Alliance for Retail Energy Markets
Email: klatt@energyattorney.com
Status: PARTY

**STEPHEN G. KOERNER, ESQ.
EL PASO CORPORATION**
WESTERN PIPELINES
2 NORTH NEVADA AVE
COLORADO SPRINGS CO 80903
FOR: El Paso Natural Gas Company/Mojave Pipeline
Company
Email: steve.koerner@elpaso.com
Status: PARTY

**AVIS KOWALEWSKI
CALPINE CORPORATION**
3875 HOPYARD ROAD, STE 345
PLEASANTON CA 94588
Email: kowalewska@calpine.com
Status: PARTY

**CATHERINE M. KRUPKA
MCDERMOTT WILL AND EMERY LLP**
600 THIRTEEN STREET, NW
WASHINGTON DC 20005
FOR: Morgan Stanley Capital Group, Inc.
Email: ckrupka@mwe.com
Status: PARTY

**STEPHANIE LA SHAWN
PACIFIC GAS AND ELECTRIC COMPANY**
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO CA 94177
Email: S1L7@pge.com
Status: INFORMATION

KIM KIENER
504 CATALINA BLVD.
SAN DIEGO CA 92106
Email: kmkiener@fox.net
Status: INFORMATION

**DANIEL A. KING
SEMPRA ENERGY**
101 ASH ST, HQ 12
SAN DIEGO CA 92101
Email: dakink@sempra.com
Status: PARTY

**JOSEPH R. KLOBERDANZ
SAN DIEGO GAS & ELECTRIC**
PO BOX 1831
SAN DIEGO CA 92112
Email: jkloberdanz@semprautilities.com
Status: INFORMATION

**GREGORY KOISER
CONSTELLATION NEW ENERGY, INC.**
350 SOUTH GRAND AVE, STE 3800
LOS ANGELES CA 90071
FOR: Constellation New Energy
Email: gregory.koiser@constellation.com
Status: PARTY

STEVE KROMER
3110 COLLEGE AVE, APT 12
BERKELEY CA 94705
FOR: Steve Kromer
Email: stevek@kromer.com
Status: INFORMATION

**LARS KVALE
CENTER FOR RESOURCE SOLUTIONS**
PRESIDIO BUILDING 97
PO BOX 39512
SAN FRANCISCO CA 94129
FOR: Center for Resource Solution
Email: lars@resource-solutions.org
Status: PARTY

**GERALD L. LAHR
ABAG POWER**
101 EIGHTH ST
OAKLAND CA 94607
FOR: Association of Bay Area Governments
Email: JerryL@abag.ca.gov
Status: INFORMATION

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Jonathan Lakritz
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5020
SAN FRANCISCO CA 94102-3214
Email: jol@cpuc.ca.gov
Status: STATE-SERVICE

JOHN LAUN
APOGEE INTERACTIVE, INC.
1220 ROSECRANS ST., STE 308
SAN DIEGO CA 92106
Email: jlaun@apogee.net
Status: INFORMATION

VITALY LEE
AES ALAMITOS, LLC
690 N. STUDEBAKER ROAD
LONG BEACH CA 90803
FOR: AES Southland LLC
Email: vitaly.lee@aes.com
Status: PARTY

NICHOLAS LENSSEN
ENERGY INSIGHTS
1750 14TH ST, STE 200
BOULDER CO 80302
Email: nlenssen@energy-insights.com
Status: INFORMATION

DONALD C. LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVE
SAN DIEGO CA 92103
FOR: California Natural Gas Vehicle Association/ Clean
Energy Fuels Corporation
Email: liddell@energyattorney.com
Status: PARTY

STEVEN G. LINS GENERAL COUNSEL
GLENDALE WATER AND POWER
613 EAST BROADWAY, STE 220
GLENDALE CA 91206-4394
Email: sllins@ci.glendale.ca.us
Status: INFORMATION

GRACE LIVINGSTON-NUNLEY ASSISTANT PROJECT
MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO CA 94177
Email: gxl2@pge.com
Status: INFORMATION

MIKE LAMOND
ALPINE NATURAL GAS OPERATING CO. #1 LLC
PO BOX 550
VALLEY SPRINGS CA 95252
Email: Mike@alpinenaturalgas.com
Status: PARTY

Diana L. Lee
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 4300
SAN FRANCISCO CA 94102-3214
FOR: DRA
Email: dil@cpuc.ca.gov
Status: PARTY

BRENDA LEMAY DIRECTOR OF PROJECT
DEVELOPMENT
HORIZON WIND ENERGY
1600 SHATTUCK, STE 222
BERKELEY CA 94709
Email: brenda.lemay@horizonwind.com
Status: INFORMATION

JOHN W. LESLIE ATTORNEY
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
11988 EL CAMINO REAL, STE 200
SAN DIEGO CA 92130
Email: jleslie@luce.com
Status: INFORMATION

KAREN LINDH
CALIFORNIA ONSITE GENERATION
7909 WALERGA ROAD, NO. 112, PMB 119
ANTELOPE CA 95843
Email: karen@klindh.com
Status: INFORMATION

STEVEN A. LIPMAN
STEVEN LIPMAN CONSULTING
500 N. ST 1108
SACRAMENTO CA 95814
FOR: Lipman Consulting
Email: steven@lipmanconsulting.com
Status: INFORMATION

BILL LOCKYER STATE ATTORNEY GENERAL
STATE OF CALIFORNIA, DEPT OF JUSTICE
PO BOX 944255
SACRAMENTO CA 94244-2550
Email: ken.alex@doj.ca.gov
Status: STATE-SERVICE

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JODY S. LONDON
JODY LONDON CONSULTING
PO BOX 3629
OAKLAND CA 94609
Email: jody_london_consulting@earthlink.net
Status: INFORMATION

BARRY LOVELL
15708 POMERADO RD., STE 203
POWAY CA 92064
Email: bjl@bry.com
Status: INFORMATION

ED LUCHA CASE COORDINATOR
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO CA 94177
Email: ELL5@pge.com
Status: INFORMATION

LYNELLE LUND
COMMERCE ENERGY, INC.
600 ANTON BLVD., STE 2000
COSTA MESA CA 92626
FOR: Commerce Energy, Inc.
Email: llund@commerceenergy.com
Status: PARTY

DOUGLAS MACMULLLEN CHIEF, POWER PLANNING
SECTION
CA DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE., RM 356
SACRAMENTO CA 95821
Email: dmacmull@water.ca.gov
Status: INFORMATION

ANNABELLE MALINS CONSUL-SCIENCE AND
TECHNOLOGY
BRITISH CONSULATE-GENERAL
ONE SANSOME ST, STE 850
SAN FRANCISCO CA 94104
Email: annabelle.malins@fco.gov.uk
Status: INFORMATION

Jaclyn Marks
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5306
SAN FRANCISCO CA 94102-3214
Email: jm3@cpuc.ca.gov
Status: STATE-SERVICE

LAD LORENZ V.P. REGULATORY AFFAIRS
SEMPRA UTILITIES
601 VAN NESS AVE, STE 2060
SAN FRANCISCO CA 94102
Email: ilorenz@semprautilities.com
Status: PARTY

BOB LUCAS
LUCAS ADVOCATES
1121 L ST, STE 407
SACRAMENTO CA 95814
Email: Bob.lucas@calobby.com
Status: INFORMATION

JANE E. LUCKHARDT ATTORNEY
DOWNEY BRAND LLP
555 CAPITOL MALL, 10TH FLR
SACRAMENTO CA 95814
FOR: Sacramento Municipal Utility District
Email: jluckhardt@downeybrand.com
Status: PARTY

MARY LYNCH VP - REGULATORY AND LEGISLATIVE
AFFAIRS
CONSTELLATION ENERGY COMMODITIES GROUP
2377 GOLD MEDAL WAY, STE 100
GOLD RIVER CA 95670
Email: mary.lynch@constellation.com
Status: PARTY

AMBER MAHONE
ENERGY & ENVIRONMENTAL ECONOMICS, INC.
101 MONTGOMERY ST, STE 1600
SAN FRANCISCO CA 94104
Email: amber@ethree.com
Status: INFORMATION

DEREK MARKOLF
CALIFORNIA CLIMATE ACTION REGISTRY
515 S. FLOWER ST, STE 1640
LOS ANGELES CA 90071
Email: derek@climateregistry.org
Status: INFORMATION

CHRIS MARNAY
BERKELEY LAB
1 CYCLOTRON RD MS 90R4000
BERKELEY CA 94720-8136
Email: C_Marnay@lbl.gov
Status: INFORMATION

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ALJ Assigned: Jonathan Lakritz on May 9, 2006

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JULIE L. MARTIN WEST ISO COORDINATOR
NORTH AMERICA GAS AND POWER
BP ENERGY COMPANY
501 WESTLAKE PARK BLVD.
HOUSTON TX 77079
Email: julie.martin@bp.com
Status: INFORMATION

DANIELLE MATTHEWS SEPERAS
CALPINE CORPORATION
1127 11TH ST, STE 242
SACRAMENTO CA 95814
FOR: Calpine Corporation
Email: dseperas@calpine.com
Status: INFORMATION

ANDREW MCALLISTER DIRECTOR OF OPERATIONS
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVE., STE 100
SAN DIEGO CA 92123
Email: andrew.mcallister@energycenter.org
Status: INFORMATION

RICHARD MCCANN, PH.D
M. CUBED
2655 PORTAGE BAY, STE 3
DAVIS CA 95616
Email: rmccann@umich.edu
Status: INFORMATION

Wade McCartney
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
770 L ST, STE 1050
SACRAMENTO CA 95814
Email: wsm@cpuc.ca.gov
Status: STATE-SERVICE

MARY MCDONALD DIRECTOR OF STATE AFFAIRS
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM CA 95630
FOR: CAISO
Status: STATE-SERVICE

BRUCE MCLAUGHLIN
BRAUN & BLAISING, P.C.
915 L ST, STE 1270
SACRAMENTO CA 95814
FOR: California Municipal Utilities Association
Email: mclaughlin@braunlegal.com
Status: PARTY

MARTIN A. MATTES
NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP
50 CALIFORNIA ST, STE 3400
SAN FRANCISCO CA 94111
Email: mmattes@nossaman.com
Status: INFORMATION

MICHAEL MAZUR CHIEF TECHNICAL OFFICER
3 PHASES RENEWABLES, LLC
8333 ZITOLA TER
PLAYA DEL REY CA 90293-7835
FOR: 3 Phases Energy Services
Email: mmazur@3phasesRenewables.com
Status: PARTY

THOMAS MCCABE
EDISON MISSION ENERGY
18101 VON KARMAN AVE., STE 1700
IRVINE CA 92612
Status: INFORMATION

BARRY F. MCCARTHY ATTORNEY
MCCARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, STE 501
SAN JOSE CA 95113
FOR: Northern California Generation Coalition
Email: bmcc@mccarthylaw.com
Status: PARTY

KEITH R. MCCREA ATTORNEY
SUTHERLAND, ASBILL & BRENNAN, LLP
1275 PENNSYLVANIA AVE., NW
WASHINGTON DC 20004-2415
FOR: California Manufacturers & Technology Assn.
Email: keith.mccrea@sablaw.com
Status: PARTY

JEN MCGRAW
CENTER FOR NEIGHBORHOOD TECHNOLOGY
PO BOX 14322
SAN FRANCISCO CA 94114
Email: jen@cnt.org
Status: INFORMATION

RACHEL McMAHON
CEERT
1100 11TH ST, STE 311
SACRAMENTO CA 95814
Email: rachel@ceert.org
Status: INFORMATION

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BRIAN MCQUOWN
RELIANT ENERGY
7251 AMIGO ST., STE 120
LAS VEGAS NV 89119
Email: bmcquown@reliant.com
Status: INFORMATION

ELENA MELLO
SIERRA PACIFIC POWER COMPANY
6100 NEIL ROAD
RENO NV 89520
Email: emello@sppc.com
Status: INFORMATION

STEVEN S. MICHEL
WESTERN RESOURCE ADVOCATES
2025 SENDA DE ANDRES
SANTA FE NM 87501
FOR: Western Resource Advocates
Email: smichel@westernresources.org
Status: PARTY

KAREN NORENE MILLS ATTORNEY
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
Email: kmills@cfbf.com
Status: INFORMATION

SAMARA MINDEL REGULATORY AFFAIRS ANALYST
FELLON-MCCORD & ASSOCIATES
9960 CORPORATE CAMPUS DRIVE, STE 2000
LOUISVILLE KY 40223
Email: smindel@knowledgeinenergy.com
Status: INFORMATION

DAVID L. MODISSETTE EXECUTIVE DIRECTOR
CALIFORNIA ELECTRIC TRANSP. COALITION
1015 K ST, STE 200
SACRAMENTO CA 95814
Email: dave@ppallc.com
Status: INFORMATION

Rahmon Momoh
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4205
SAN FRANCISCO CA 94102-3214
Email: rmm@cpuc.ca.gov
Status: STATE-SERVICE

JAMES W. MCTARNAGHAN ATTORNEY
DUANE MORRIS LLP
ONE MARKET, SPEAR TOWER 2000
SAN FRANCISCO CA 94105-1104
Email: jwmctarnaghan@duanemorris.com
Status: INFORMATION

DARYL METZ
CALIFORNIA ENERGY COMMISSION
1516 9TH ST., MS-20
SACRAMENTO CA 95814
Email: dmetz@energy.state.ca.us
Status: STATE-SERVICE

ROSS A. MILLER ELECTRICITY ANALYSIS OFFICE
CALIFORNIA ENERGY COMMISSION
1516 9TH ST MS 20
SACRAMENTO CA 96814-5512
FOR: CALIFORNIA ENERGY COMMISSION
Email: rmiller@energy.state.ca.us
Status: STATE-SERVICE

MARCIE MILNER DIRECTOR - REGULATORY AFFAIRS
SHELL TRADING GAS & POWER COMPANY
4445 EASTGATE MALL, STE 100
SAN DIEGO CA 92121
Email: marcie.milner@shell.com
Status: PARTY

CYNTHIA MITCHELL
ENERGY ECONOMICS, INC.
530 COLGATE COURT
RENO NV 89503
Email: ckmitchell1@sbcglobal.net
Status: INFORMATION

Ed Moldavsky
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5037
SAN FRANCISCO CA 94102-3214
Email: edm@cpuc.ca.gov
Status: STATE-SERVICE

WES MONIER STRATEGIC ISSUES AND PLANNING
MANAGER
TURLOCK IRRIGATION DISTRICT
333 EAST CANAL DRIVE, PO BOX 949
TURLOCK CA 95381-0949
Email: fwmonier@tid.org
Status: INFORMATION

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**ROGER C. MONTGOMERY VICE PRESIDENT, PRICING
SOUTHWEST GAS CORPORATION**
PO BOX 98510
LAS VEGAS NV 89193-8510
Email: roger.montgomery@swgas.com
Status: PARTY

**RONALD MOORE
GOLDEN STATE WATER/BEAR VALLEY ELECTRIC**
630 EAST FOOTHILL BLVD
SAN DIMAS CA 91773
FOR: Golden State Water/Bear Valley Electric
Email: rkmoore@gswater.com
Status: PARTY

**GREGG MORRIS DIRECTOR
GREEN POWER INSTITUTE**
2039 SHATTUCK AVE, STE 402
BERKELEY CA 94704
FOR: Green Power Institute
Email: gmorris@emf.net
Status: PARTY

**STEVEN MOSS
SAN FRANCISCO COMMUNITY POWER COOP**
2325 3RD ST, STE 344
SAN FRANCISCO CA 94120
Email: steven@moss.net
Status: INFORMATION

Lainie Motamedi
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
505 VAN NESS AVE RM 5119
SAN FRANCISCO CA 94102-3214
Email: lrm@cpuc.ca.gov
Status: STATE-SERVICE

**CLYDE MURLEY
CONSULTANT TO NRDC**
1031 ORDWAY ST
ALBANY CA 94706
Email: clyde.murley@comcast.net
Status: INFORMATION

Richard A. Myers
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: ram@cpuc.ca.gov
Status: STATE-SERVICE

Beth Moore
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4103
SAN FRANCISCO CA 94102-3214
Email: blm@cpuc.ca.gov
Status: STATE-SERVICE

**RICHARD J. MORILLO ASSISTANT CITY ATTORNEY
CITY OF BURBANK**
215 E. OLIVE AVE
BURBANK CA 91502
Email: rmorillo@ci.burbank.ca.us
Status: INFORMATION

Harvey Y. Morris
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5036
SAN FRANCISCO CA 94102-3214
Email: hym@cpuc.ca.gov
Status: STATE-SERVICE

**MATTHEW MOST
EDISON MISSION MARKETING & TRADING, INC.**
160 FEDERAL ST
BOSTON MA 02110-1776
Status: INFORMATION

**PHILLIP J. MULLER
SCD ENERGY SOLUTIONS**
436 NOVA ALBION WAY
SAN RAFAEL CA 94903
Email: philm@scdenergy.com
Status: INFORMATION

Scott Murtishaw
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: sgm@cpuc.ca.gov
Status: STATE-SERVICE

SARA STECK MYERS ATTORNEY
122 28TH AVE
SAN FRANCISCO CA 94121
FOR: Center for Energy Efficiency and Renewable
Technologies
Email: ssmyers@att.net
Status: PARTY

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JESSICA NELSON
PLUMAS-SIERRA RURAL ELECTRIC CO-OP
73233 STATE ROUTE 70, STE A
PORTOLA CA 96122-7064
FOR: Plumas-Sierra Rural Electric Coop
Email: notice@psrec.coop
Status: PARTY

SID NEWSOM TARIFF MANAGER
SOUTHERN CALIFORNIA GAS COMPANY
GT 14 D6
555 WEST 5TH ST
LOS ANGELES CA 90051
Email: snewsom@semprautilities.com
Status: PARTY

SEPHRA A. NINOW POLICY ANALYST
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVE, STE 100
SAN DIEGO CA 92123
Email: sephra.ninow@energycenter.org
Status: INFORMATION

RITA NORTON
RITA NORTON AND ASSOCIATES, LLC
18700 BLYTHSWOOD DRIVE,
LOS GATOS CA 95030
Email: rita@ritanortonconsulting.com
Status: INFORMATION

ALVIN PAK
SEMPRA GLOBAL ENTERPRISES
101 ASH ST
SAN DIEGO CA 92101
FOR: Sempra Global Enterprises
Email: apak@sempraglobal.com
Status: PARTY

LORRAINE PASKETT DIRECTOR, LEGISLATIVE AND
REG. AFFAIRS
LA DEPT. OF WATER & POWER
PO BOX 51111
111 N. HOWARD ST., RM 1536
LOS ANGELES CA 90012
FOR: Los Angeles Dept of Water and Power
Email: Lorraine.Paskett@ladwp.com
Status: PARTY

JOSEPH PAUL SENIOR CORPORATE COUNSEL
DYNEGY, INC.
4140 DUBLIN BLVD., STE. 100
DUBLIN CA 94568
Email: Joe.paul@dynegy.com
Status: INFORMATION

DAVID NEMTZOW
1254 9TH ST, NO. 6
SANTA MONICA CA 90401
Email: david@nemtzow.com
Status: INFORMATION

DESPINA NIEHAUS
SAN DIEGO GAS AND ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32H
SAN DIEGO CA 92123-1530
FOR: San Diego Gas and Electric Company
Email: dniehaus@semprautilities.com
Status: INFORMATION

RICK C. NOGER
PRAXAIR PLAINFIELD, INC.
2711 CENTERVILLE ROAD, STE 400
WILMINGTON DE 19808
FOR: Praxair Plainfield, Inc.
Email: rick_noger@praxair.com
Status: PARTY

TIMOTHY R. ODIL
MCKENNA LONG & ALDRIDGE LLP
1875 LAWRENCE ST, STE 200
DENVER CO 80202
FOR: Center for Energy and Economic Development
Email: todil@mckennalong.com
Status: PARTY

LAURIE PARK
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670-6078
Email: lpark@navigantconsulting.com
Status: INFORMATION

SHERIDAN J. PAUKER
WILSON SONSINI GOODRICH & ROSATI
SPEAR TOWER, SUITE 3300
ONE MARKET ST
SAN FRANCISCO CA 94105
Email: spauker@wsgr.com
Status: INFORMATION

CARL PECHMAN
POWER ECONOMICS
901 CENTER ST
SANTA CRUZ CA 95060
Email: cpechman@powereconomics.com
Status: INFORMATION

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

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NORMAN A. PEDERSEN ATTORNEY
HANNA AND MORTON, LLP
444 SOUTH FLOWER ST, NO. 1500
LOS ANGELES CA 90071
FOR: Southern California Generation Coalition/Southern California Public Power Authority
Email: npedersen@hanmor.com
Status: PARTY

Joel T. Perlstein
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
505 VAN NESS AVE RM 5133
SAN FRANCISCO CA 94102-3214
Email: jtp@cpuc.ca.gov
Status: STATE-SERVICE

COLIN PETHERAM DIRECTOR-REGULATORY
SBC CALIFORNIA
140 NEW MONTGOMERY ST., STE 1325
SAN FRANCISCO CA 94105
Email: colin.petheram@att.com
Status: INFORMATION

PHILIP D. PETTINGILL
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM CA 95630
FOR: CAISO
Email: ppettingill@caiso.com
Status: STATE-SERVICE

GORDON PICKERING PRINCIPAL
NAVIGANT CONSULTING, INC.
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670-6078
Email: gpickering@navigantconsulting.com
Status: INFORMATION

JENNIFER PORTER POLICY ANALYST
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVE, STE 100
SAN DIEGO CA 92123
Email: jennifer.porter@energycenter.org
Status: INFORMATION

VIDHYA PRABHAKARAN
GOODIN, MACBRIDE, SQUERI, DAY, LAMPREY
505 SANSCOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: Independent Energy Producers Association
Email: vprabhakaran@goodinmacbride.com
Status: PARTY

JAN PEPPER
CLEAN POWER MARKETS, INC.
PO BOX 3206
418 BENVENUE AVE
LOS ALTOS CA 94024
Email: pepper@cleanpowermarkets.com
Status: INFORMATION

CARLA PETERMAN
UCEI
2547 CHANNING WAY
BERKELEY CA 94720
Email: carla.peterman@gmail.com
Status: INFORMATION

ROBERT L. PETTINATO
LOS ANGELES DEPARTMENT OF WATER & POWER
111 NORTH HOPE ST, STE 1151
LOS ANGELES CA 90012
Email: robert.pettinato@ladwp.com
Status: INFORMATION

Paul S. Phillips
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4101
SAN FRANCISCO CA 94102-3214
Email: psp@cpuc.ca.gov
Status: STATE-SERVICE

EDWARD G POOLE
ANDERSON DONOVAN & POOLE
601 CALIFORNIA ST STE 1300
SAN FRANCISCO CA 94108
FOR: San Francisco Community Power
Email: epoole@adplaw.com
Status: PARTY

BRIAN POTTS
FOLEY & LARDNER
PO BOX 1497
150 EAST GILMAN ST
MADISON WI 53701-1497
Email: bpotts@foley.com
Status: INFORMATION

RASHA PRINCE
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST 5TH ST, GT14D6
LOS ANGELES CA 90013
Email: rprince@semprautilities.com
Status: INFORMATION

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JJ PRUCNAL
SOUTHWEST GAS CORPORATION
PO BOX 98510
LAS VEGAS NV 89193-8510
Email: jj.prucnal@swgas.com
Status: INFORMATION

BALWANT S. PUREWAL
DEPARTMENT OF WATER RESOURCES
3310 EL CAMINO AVE., LL-90
SACRAMENTO CA 95821
Email: bpurewal@water.ca.gov
Status: INFORMATION

STEVE RAHON DIRECTOR, TARIFF & REGULATORY ACCOUNTS
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32C
SAN DIEGO CA 92123-1548
FOR: San Diego Gas & Electric Company
Email: lschavrien@semprautilities.com
Status: PARTY

TIFFANY RAU POLICY AND COMMUNICATIONS MANAGER
CARSON HYDROGEN POWER PROJECT LLC
ONE WORLD TRADE CENTER, STE 1600
LONG BEACH CA 90831-1600
FOR: Carson Hydrogen Power Project LLC
Email: tiffany.rau@bp.com
Status: PARTY

ROBERT J. REINHARD
MORRISON AND FOERSTER
425 MARKET ST
SAN FRANCISCO CA 94105-2482
Email: rreinhard@mofa.com
Status: INFORMATION

JANILL RICHARDS DEPUTY ATTORNEY GENERAL
CALIFORNIA ATTORNEY GENERAL'S OFFICE
1515 CLAY ST, 20TH FLR
OAKLAND CA 94702
FOR: People of the State of California
Email: janill.richards@doj.ca.gov
Status: PARTY

Steve Roscow
CALIF PUBLIC UTILITIES COMMISSION
RATEMAKING BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: scr@cpuc.ca.gov
Status: STATE-SERVICE

MARC PRYOR
CALIFORNIA ENERGY COMMISSION
1516 9TH ST., MS-20
SACRAMENTO CA 95814
Email: mpryor@energy.state.ca.us
Status: STATE-SERVICE

BARRY RABE
1427 ROSS ST
PLYMOUTH MI 48170
Email: brabe@umich.edu
Status: INFORMATION

Kristin Ralff Douglas
CALIF PUBLIC UTILITIES COMMISSION
POLICY & PLANNING DIVISION
505 VAN NESS AVE RM 5119
SAN FRANCISCO CA 94102-3214
Email: krd@cpuc.ca.gov
Status: STATE-SERVICE

JOHN R. REDDING
ARCTURUS ENERGY CONSULTING
44810 ROSEWOOD TERRACE
MENDOCINO CA 95460
Email: johnrredding@earthlink.net
Status: INFORMATION

DAVID REYNOLDS MEMBER SERVICES MANAGER
NORTHERN CALIFORNIA POWER AGENCY
180 CIRBY WAY
ROSEVILLE CA 95678-6420
Email: davidreynolds@ncpa.com
Status: INFORMATION

THEODORE ROBERTS ATTORNEY
SEMPRA GLOBAL
101 ASH ST, HQ 13D
SAN DIEGO CA 92101-3017
FOR: Sempra Global/Sempra Energy Solutions
Email: troberts@sempra.com
Status: PARTY

GRANT ROSENBLUM, ESQ.
CALIFORNIA ISO
LEGAL AND REGULATORY DEPARTMENT
151 BLUE RAVINE ROAD
FOLSOM CA 95630
Email: grosenblum@caiso.com
Status: INFORMATION

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JAMES ROSS
RCS, INC.
500 CHESTERFIELD CENTER, STE 320
CHESTERFIELD MO 63017
Email: jimross@r-c-s-inc.com
Status: INFORMATION

Nancy Ryan
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5217
SAN FRANCISCO CA 94102-3214
Email: ner@cpuc.ca.gov
Status: STATE-SERVICE

RANDY SABLE
SOUTHWEST GAS CORPORATION
MAILSTOP: LVB-105
5241 SPRING MOUNTAIN ROAD
LAS VEGAS NV 89193
Email: randy.sable@swgas.com
Status: INFORMATION

Jason R. Salmi Klotz
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: jk1@cpuc.ca.gov
Status: STATE-SERVICE

SOUMYA SASTRY
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE B9A
PO BOX 770000
SAN FRANCISCO CA 94177
Email: svs6@pge.com
Status: INFORMATION

MICHAEL SCHEIBLE DEPUTY EXECUTIVE OFFICER
CALIFORNIA AIR RESOURCES BOARD
1001 I ST
SACRAMENTO CA 95677
FOR: California Air Resources Board
Email: mscheibl@arb.ca.gov
Status: STATE-SERVICE

STEVEN SCHILLER
SCHILLER CONSULTING, INC.
111 HILLSIDE AVE
PIEDMONT CA 94611
Email: steve@schiller.com
Status: INFORMATION

ROBERT K. ROZANSKI
LOS ANGELES DEPT OF WATER AND POWER
111 NORTH HOPE ST, RM 1520
LOS ANGELES CA 90012
Email: Robert.Rozanski@ladwp.com
Status: INFORMATION

Pearlie Sabino
CALIF PUBLIC UTILITIES COMMISSION
ENERGY COST OF SERVICE & NATURAL GAS BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: pzs@cpuc.ca.gov
Status: STATE-SERVICE

SAM SADLER
OREGON DEPARTMENT OF ENERGY
625 NE MARION ST
SALEM OR 97301-3737
Email: samuel.r.sadler@state.or.us
Status: INFORMATION

JUDITH B. SANDERS ATTORNEY
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM CA 95630
FOR: CAISO
Email: jsanders@caiso.com
Status: STATE-SERVICE

JANINE L. SCANCARELLI ATTORNEY
FOLGER, LEVIN & KAHN, LLP
275 BATTERY ST, 23RD FLR
SAN FRANCISCO CA 94111
Email: jscancarelli@flk.com
Status: INFORMATION

JENINE SCHENK
APS ENERGY SERVICES
400 E. VAN BUREN ST, STE 750
PHOENIX AZ 85004
FOR: APS Energy Services Company
Email: jenine.schenk@apses.com
Status: PARTY

STEVEN S. SCHLEIMER DIRECTOR,COMPLIANCE &
REGULATORY AFFAIRS
BARCLAYS BANK, PLC
200 PARK AVE, FIFTH FLR
NEW YORK NY 10166
FOR: Barclays Capital
Email: steven.schleimer@barclayscapital.com
Status: PARTY

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REED V. SCHMIDT VICE PRESIDENT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVE
BERKELEY CA 94703
FOR: California City-County Street Light Association
Email: rschmidt@bartlewells.com
Status: INFORMATION

BILL SCHRAND
SOUTHWEST GAS CORPORATON
PO BOX 98510
LAS VEGAS NV 89193-8510
Email: bill.schrard@swgas.com
Status: INFORMATION

Don Schultz
CALIF PUBLIC UTILITIES COMMISSION
ENERGY PRICING AND CUSTOMER PROGRAMS
BRANCH
770 L ST, STE 1050
SACRAMENTO CA 95814
Email: dks@cpuc.ca.gov
Status: STATE-SERVICE

MONICA A. SCHWEBS, ESQ.
BINGHAM MCCUTCHEN LLP
PO BOX V
1333 N. CALIFORNIA BLVD., STE 210
WALNUT CREEK CA 94596
Email: monica.schwebs@bingham.com
Status: INFORMATION

BETTY SETO POLICY ANALYST
KEMA, INC.
492 NINTH ST, STE 220
OAKLAND CA 94607
Email: Betty.Seto@kema.com
Status: INFORMATION

KYLE SILON
ECOSECURITIES CONSULTING LIMITED
529 SE GRAND AVE
PORTLAND OR 97214
Email: kyle.silon@ecosecurities.com
Status: INFORMATION

Sean A. Simon
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: svn@cpuc.ca.gov
Status: STATE-SERVICE

DONALD SCHOENBECK
RCS, INC.
900 WASHINGTON ST, STE 780
VANCOUVER WA 98660
Email: dws@r-c-s-inc.com
Status: INFORMATION

CYNTHIA SCHULTZ REGULATORY FILING
COORDINATOR
PACIFIC POWER AND LIGHT COMPANY
825 NE MULTNOMAH
PORTLAND OR 97232
Email: cynthia.schultz@pacificorp.com
Status: PARTY

LISA SCHWARTZ SENIOR ANALYST
ORGEON PUBLIC UTILITY COMMISSION
PO BOX 2148
SALEM OR 97308-2148
Email: lisa.c.schwartz@state.or.us
Status: INFORMATION

PAUL M. SEBY
MCKENNA LONG & ALDRIDGE LLP
1875 LAWRENCE ST, STE 200
DENVER CO 80202
FOR: Center for Energy and Economic Development
Email: pseby@mckennalong.com
Status: PARTY

NORA SHERIFF ATTORNEY
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
Email: nes@a-klaw.com
Status: INFORMATION

DAN SILVERIA
SURPRISE VALLEY ELECTRIC CORPORATION
PO BOX 691
ALTURAS CA 96101
FOR: Surprise Valley Electric Cooperative
Email: dansvec@hdo.net
Status: PARTY

KEVIN J. SIMONSEN
ENERGY MANAGEMENT SERVICES
646 EAST THIRD AVE
DURANGO CO 81301
Email: kjsimonsen@ems-ca.com
Status: INFORMATION

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DAN SKOPEC
CLIMATE & ENERGY CONSULTING
1201 K ST STE 970
SACRAMENTO CA 95814
FOR: Climate & Energy Consulting
Email: danskopec@gmail.com
Status: INFORMATION

Donald R. Smith
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: dsh@cpuc.ca.gov
Status: STATE-SERVICE

KELLIE SMITH
SENATE ENERGY/UTILITIES & COMMUNICATION
STATE CAPITOL, RM 4038
SACRAMENTO CA 95814
Email: kellie.smith@sen.ca.gov
Status: INFORMATION

ROBIN SMUTNY-JONES
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM CA 95630
Email: rsmutny-jones@caiso.com
Status: INFORMATION

DARRELL SOYARS MANAGER-RESOURCE
PERMITTING&STRATEGIC
SIERRA PACIFIC RESOURCES
6100 NEIL ROAD
RENO NV 89520-0024
FOR: Sierra Pacific Resources
Email: dsoyars@sppc.com
Status: INFORMATION

SEEMA SRINIVASAN ATTORNEY
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
FOR: Energy Producers & Users Coalition
Email: sls@a-klaw.com
Status: PARTY

FRANK STERN
SUMMIT BLUE CONSULTING
1722 14TH ST, STE 230
BOULDER CO 80302
FOR: Summit Blue Consulting
Email: fstern@summitblue.com
Status: INFORMATION

DEBORAH SLON DEPUTY ATTORNEY GENERAL,
ENVIRONMENT
OFFICE OF THE ATTORNEY GENERAL
1300 I ST, 15TH FLR
SACRAMENTO CA 95814
Email: deborah.slon@doj.ca.gov
Status: STATE-SERVICE

GLORIA D. SMITH
ADAMS, BROADWELL, JOSEPH & CARDOZO
601 GATEWAY BLVD., STE 1000
SOUTH SAN FRANCISCO CA 94080
Email: gsmith@adamsbroadwell.com
Status: INFORMATION

RICHARD SMITH
MODESTO IRRIGATION DISTRICT
1231 11TH ST
MODESTO CA 95352-4060
Email: richards@mid.org
Status: INFORMATION

JEANNE M. SOLE DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM. 234
SAN FRANCISCO CA 94102
FOR: City and County of San Francisco
Email: jeanne.sole@sfgov.org
Status: PARTY

JAMES D. SQUERI ATTORNEY
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME ST, STE 900
SAN FRANCISCO CA 94111
FOR: Powerex Corp.
Email: jsqueri@gmssr.com
Status: PARTY

ANNIE STANGE
ALCANTAR & KAHL
1300 SW FIFTH AVE., STE 1750
PORTLAND OR 97201
Email: sas@a-klaw.com
Status: INFORMATION

F. Jackson Stoddard
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
505 VAN NESS AVE RM 5125
SAN FRANCISCO CA 94102-3214
Email: fjs@cpuc.ca.gov
Status: PARTY

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Elizabeth Stoltzfus
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: eks@cpuc.ca.gov
Status: STATE-SERVICE

NINA SUETAKE ATTORNEY
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., STE. 350
SAN FRANCISCO CA 94102
Email: nsuetake@turn.org
Status: PARTY

George S. Tagripes
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: jst@cpuc.ca.gov
Status: STATE-SERVICE

JAMES W. TARNAGHAN
DUANE MORRIS LLP
SUITE 2000
ONE MARKET, SPEAR TOWER
SAN FRANCISCO CA 94105
FOR: Lodi Gas Storage
Email: jwmc.tarnaghan@duanemorris.com
Status: INFORMATION

ROBERT R. TAYLOR
AGRICULTURAL IMPROVEMENT AND POWER DIST.
1600 NORTH PRIEST DRIVE, PAB221
TEMPE AZ 85281
Email: rrtaylor@srpnet.com
Status: PARTY

KAREN TERRANOVA
ALCANTAR & KAHL, LLP
120 MONTGOMERY ST, STE 2200
SAN FRANCISCO CA 94104
Email: filings@a-klaw.com
Status: INFORMATION

DEAN R. TIBBS PRESIDENT
ADVANCED ENERGY STRATEGIES, INC.
1390 WILLOW PASS ROAD, STE 610
CONCORD CA 94520
Email: dtibbs@aes4u.com
Status: INFORMATION

PATRICK STONER PROGRAM DIRECTOR
LOCAL GOVERNMENT COMMISSION
1303 J ST, STE 250
SACRAMENTO CA 95814
Email: pstoner@lgc.org
Status: INFORMATION

KENNY SWAIN
NAVIGANT CONSULTING
3100 ZINFANDEL DRIVE, STE 600
RANCHO CORDOVA CA 95670
Email: kenneth.swain@navigantconsulting.com
Status: INFORMATION

Christine S. Tam
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY PLANNING & POLICY BRANCH
505 VAN NESS AVE RM 4209
SAN FRANCISCO CA 94102-3214
Email: tam@cpuc.ca.gov
Status: STATE-SERVICE

WEBSTER TASAT
AIR RESOURCES BOARD
1001 I ST
SACRAMENTO CA 95814
Email: wtasat@arb.ca.gov
Status: INFORMATION

Charlotte TerKeurst
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5117
SAN FRANCISCO CA 94102-3214
Email: cft@cpuc.ca.gov
Status: STATE-SERVICE

PATRICIA THOMPSON
SUMMIT BLUE CONSULTING
2920 CAMINO DIABLO, STE 210
WALNUT CREEK CA 94597
Email: pthompson@summitblue.com
Status: INFORMATION

EDWARD J. TIEDEMANN ATTORNEY
KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
400 CAPITOL MALL, 27TH FLR
SACRAMENTO CA 95814-4416
FOR: Placer County Water Agency & Kings River
Conservation District
Email: etiedemann@kmtg.com
Status: INFORMATION

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SCOTT TOMASHEFSKY
NORTHERN CALIFORNIA POWER AGENCY
180 CIRBY WAY
ROSEVILLE CA 95678-6420
Email: scott.tomashefsky@ncpa.com
Status: INFORMATION

Lana Tran
CALIF PUBLIC UTILITIES COMMISSION
ELECTRIC GENERATION PERFORMANCE BRANCH
505 VAN NESS AVE AREA 2-D
SAN FRANCISCO CA 94102-3214
Email: ltt@cpuc.ca.gov
Status: STATE-SERVICE

NANCY TRONAAS
CALIFORNIA ENERGY COMMISSION
1516 9TH ST. MS-20
SACRAMENTO CA 95814-5512
Email: ntronaas@energy.state.ca.us
Status: STATE-SERVICE

ANDREW J. VAN HORN
VAN HORN CONSULTING
12 LIND COURT
ORINDA CA 94563
Email: andy.vanhorn@vhcenergy.com
Status: INFORMATION

BETH VAUGHAN
CALIFORNIA COGENERATION COUNCIL
4391 N. MARSH ELDER COURT
CONCORD CA 94521
Email: beth@beth411.com
Status: PARTY

SYMONE VONGDEUANE
SEMPRA ENERGY SOLUTIONS
101 ASH ST, HQ09
SAN DIEGO CA 92101-3017
FOR: Sempra Energy Solutions
Email: svongdeuane@semprasolutions.com
Status: PARTY

DEVRA WANG
NATURAL RESOURCES DEFENSE COUNCIL
111 SUTTER ST, 20TH FLR
SAN FRANCISCO CA 94104
Email: dwang@nrdc.org
Status: INFORMATION

WAYNE TOMLINSON
EL PASO CORPORATION
WESTERN PIPELINES
2 NORTH NEVADA AVE
COLORADO SPRINGS CO 80903
Email: william.tomlinson@elpaso.com
Status: INFORMATION

ALLEN K. TRIAL
SAN DIEGO GAS & ELECTRIC COMPANY
HQ-12
101 ASH ST
SAN DIEGO CA 92101
Email: atrial@sempra.com
Status: PARTY

ANN L. TROWBRIDGE ATTORNEY
DAY CARTER & MURPHY, LLP
3620 AMERICAN RIVER DRIVE, STE 205
SACRAMENTO CA 95864
FOR: California Clean DG Coalition/Northwest Natural Gas
Email: atrowbridge@daycartermurphy.com
Status: PARTY

ROGER VAN HOY
MODESTO IRRIGATION DISTRICT
1231 11TH ST
MODESTO CA 95354
Email: rogerv@mid.org
Status: INFORMATION

EDWARD VINE
LAWRENCE BERKELEY NATIONAL LABORATORY
BUILDING 90R4000
BERKELEY CA 94720
Email: elvine@lbl.gov
Status: INFORMATION

BARRY R. WALLERSTEIN EXECUTIVE OFFICER
SOUTH COAST AQMD
21865 COPLEY DRIVE
DIAMOND BAR CA 91765-4182
FOR: South Coast Air Quality Management District
Email: bwallerstein@aqmd.gov
Status: PARTY

CHRISTOPHER J. WARNER
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST, PO BOX 7442
SAN FRANCISCO CA 94120-7442
FOR: Pacific Gas and Electric
Email: cjw5@pge.com
Status: PARTY

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JOY A. WARREN REGULATORY ADMINISTRATOR
MODESTO IRRIGATION DISTRICT
1231 11TH ST
MODESTO CA 95354
Email: joyw@mid.org
Status: PARTY

LISA WEINZIMER ASSOCIATE EDITOR
PLATTS MCGRAW-HILL
695 NINTH AVE, NO. 2
SAN FRANCISCO CA 94118
Email: lisa_weinzimer@platts.com
Status: INFORMATION

VIRGIL WELCH STAFF ATTORNEY
ENVIRONMENTAL DEFENSE
1107 9TH ST, STE 540
SACRAMENTO CA 95814
Email: vwelch@environmentaldefense.org
Status: PARTY

ANDREA WELLER
STRATEGIC ENERGY
3130 D BALFOUR RD., STE 290
BRENTWOOD CA 94513
FOR: Strategic Energy
Email: aweller@sel.com
Status: PARTY

ELIZABETH WESTBY
ALCANTAR & KAHL, LLP
1300 SW FIFTH AVE, STE 1750
PORTLAND OR 97201
Email: egw@a-klaw.com
Status: INFORMATION

BRAD WETSTONE
236 HARTFORD ST
SAN FRANCISCO CA 94114
Email: bwetstone@hotmail.com
Status: INFORMATION

GREGGORY L. WHEATLAND ATTORNEY
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H ST
SACRAMENTO CA 95814
FOR: LS Power, Inc.
Email: glw@eslawfirm.com
Status: PARTY

MICHAEL WAUGH
AIR RESOURCES BOARD
1001 10TH ST
SACRAMENTO CA 95814
Email: mwaugh@arb.ca.gov
Status: INFORMATION

RAY WELCH ASSOCIATE DIRECTOR
NAVIGANT CONSULTING, INC.
ONE MARKET PLAZA, STE 1200
SAN FRANCISCO CA 94105
Email: ray.welch@navigantconsulting.com
Status: INFORMATION

JOHN B. WELDON, JR.
SALMON, LEWIS & WELDON, P.L.C.
2850 EAST CAMELBACK ROAD, STE 200
PHOENIX AZ 85016
FOR: Salt River Project Agricultural Improvement and
Power District
Email: jbw@slwplc.com
Status: PARTY

Pamela Wellner
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
505 VAN NESS AVE AREA 4-A
SAN FRANCISCO CA 94102-3214
Email: pw1@cpuc.ca.gov
Status: STATE-SERVICE

WILLIAM W. WESTERFIELD, 111 ATTORNEY
ELLISON, SCHNEIDER & HARRIS L.L.P.
2015 H ST
SACRAMENTO CA 95814
FOR: Sierra Pacific Power Company
Email: www@eslawfirm.com
Status: PARTY

S. NANCY WHANG ATTORNEY
MANATT, PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD.
LOS ANGELES CA 90064
Email: nwhang@manatt.com
Status: INFORMATION

JOSEPH F. WIEDMAN ATTORNEY
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANOME ST, STE 900
SAN FRANCISCO CA 94111
Email: jwiedman@goodinmacbride.com
Status: INFORMATION

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KATHRYN WIG PARALEGAL
NRG ENERGY, INC.
211 CARNEGIE CENTER
PRINCETON NY 8540
Email: Kathryn.Wig@nrgenergy.com
Status: INFORMATION

REID A. WINTHROP
PILOT POWER GROUP, INC.
8910 UNIVERSITY CENTER LANE, STE 520
SAN DIEGO CA 92122
Email: rwinthrop@pilotpowergroup.com
Status: PARTY

ELLEN WOLFE
RESERO CONSULTING
9289 SHADOW BROOK PL.
GRANITE BAY CA 95746
Email: ewolfe@resero.com
Status: INFORMATION

KEVIN WOODRUFF
WOODRUFF EXPERT SERVICES
1100 K ST, STE 204
SACRAMENTO CA 95814
Email: kdw@woodruff-expert-services.com
Status: INFORMATION

E.J. WRIGHT
OCCIDENTAL POWER SERVICES, INC.
5 GREENWAY PLAZA, STE 110
HOUSTON TX 77046
Email: ej_wright@oxy.com
Status: PARTY

HUGH YAO
SOUTHERN CALIFORNIA GAS COMPANY
555 W. 5TH ST, GT22G2
LOS ANGELES CA 90013
Email: HYao@SempraUtilities.com
Status: INFORMATION

JEANNE ZAIONTZ
BP ENERGY COMPANY
501 WESTLAKE PARK BLVD, RM. 4328
HOUSTON TX 77079
Email: zaiontj@bp.com
Status: INFORMATION

VALERIE J. WINN
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, B9A
SAN FRANCISCO CA 94177-0001
Email: vjw3@pge.com
Status: INFORMATION

RYAN WISER
BERKELEY LAB
MS-90-4000
ONE CYCLOTRON ROAD
BERKELEY CA 94720
Email: rhwiser@lbl.gov
Status: INFORMATION

DON WOOD
PACIFIC ENERGY POLICY CENTER
4539 LEE AVE
LA MESA CA 91941
Email: dwood8@cox.net
Status: PARTY

CATHY S. WOOLLUMS
MIDAMERICAN ENERGY HOLDINGS COMPANY
106 EAST SECOND ST
DAVENPORT IA 52801
FOR: Kern River Gas Transmission
Email: cswoollums@midamerican.com
Status: PARTY

JUSTIN C. WYNNE
BRAU & BLAISING, P.C.
915 L ST, STE 1270
SACRAMENTO CA 95814
Email: wynne@braunlegal.com
Status: INFORMATION

Amy C. Yip-Kikugawa
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
505 VAN NESS AVE RM 5135
SAN FRANCISCO CA 94102-3214
Email: ayk@cpuc.ca.gov
Status: STATE-SERVICE

ELIZABETH ZELLJADT
1725 I ST, NW STE 300
WASHINGTON DC 20006
Email: ez@pointcarbon.com
Status: INFORMATION

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DAVID ZONANA DEPUTY ATTORNEY GENERAL
CALIFORNIA ATTORNEY GENERAL'S OFFICE
455 GOLDEN GATE AVE, STE 11000
SAN FRANCISCO CA 94102
Email: david.zonana@doj.ca.gov
Status: STATE-SERVICE